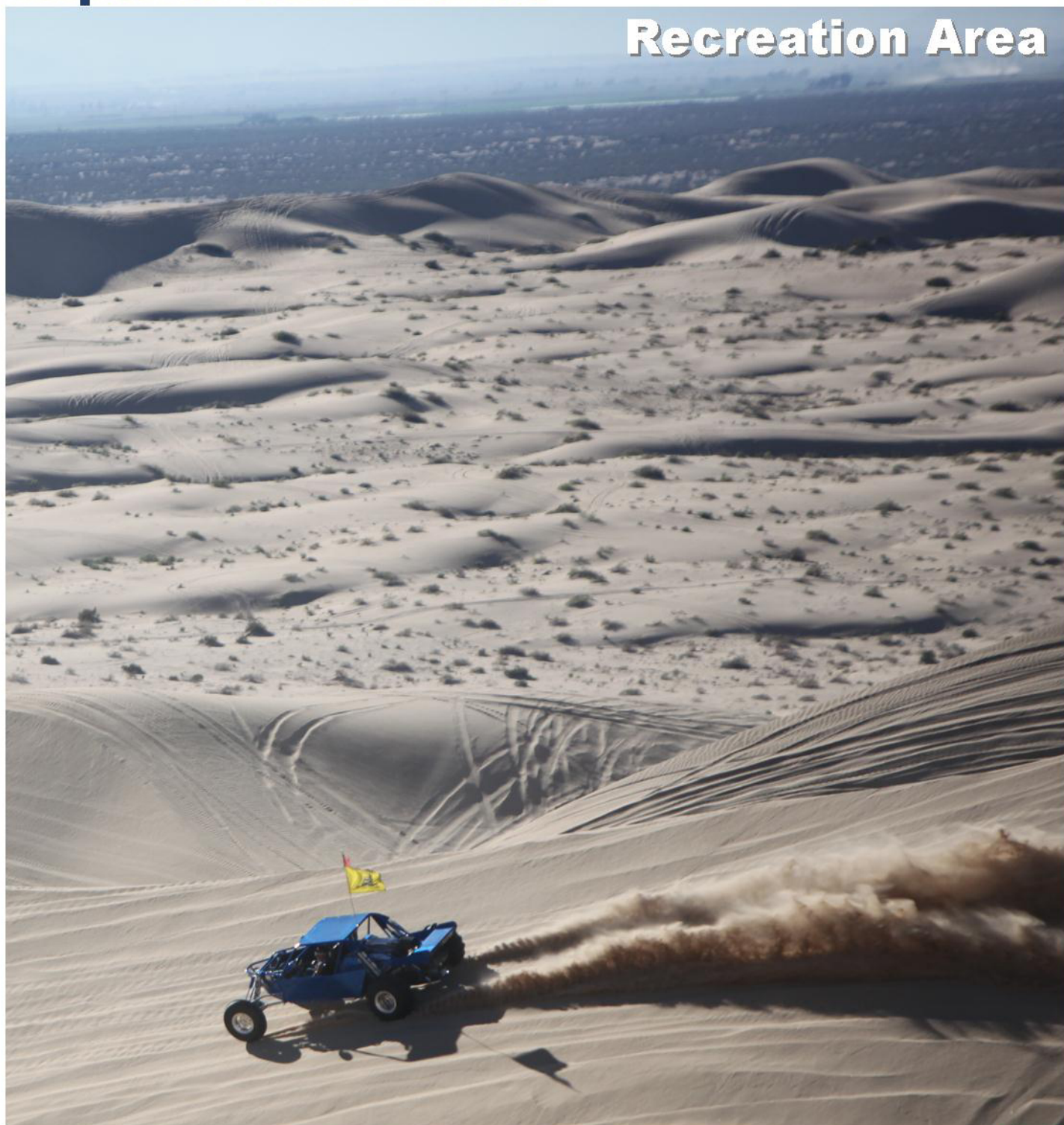


Imperial Sand Dunes

Recreation Area



California Desert District, El Centro Field Office



Business Plan 2013

Imperial Sand Dunes Recreation Area Business Plan

**Proposed Fee Adjustment 2013
Imperial County, California**

**United States Department of the Interior, Bureau of Land Management
El Centro Field Office**

May 31st, 2013

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In Reply Refer To:
8372(P)
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Dear Reader,

The following enclosed document is the Imperial Sand Dunes Recreation Area Business Plan – Proposed Fee Adjustment 2013. The Bureau of Land Management (BLM), El Centro Field Office has prepared this business plan, in accordance with regulation, policy and guidance, including elements of public participation and review, to adjust the existing Special Area Individual Special Recreation Permit (SRP) for fees within the project area.

The Project Area is the Imperial Sand Dunes Recreation Area (ISDRA) and a one-mile fee-area buffer around the ISDRA. The business plan refers to this entire area as the ISDRA unless otherwise specified.

The document provides a brief description of authorities and processes used to create and adjust recreation fees along with an area description, information regarding current management, the proposed fee adjustment itself and the anticipated impacts of such an adjustment on revenues, and the socio-economic interests of the area.

At this stage, the business plan is published for informational review only. The fee-adjustment proposal will be presented to a Recreation Resource Advisory Council (R/RAC). This R/RAC will review the business plan, consider public input on the fee-adjustment proposal, and ultimately make a recommendation to the BLM. The R/RAC recommendation will affirm, modify, or not affirm, the proposal. Should the R/RAC affirm or modify the proposal, the BLM will continue with fee-adjustment implementation for the coming visitor-use season. If the R/RAC fails to affirm the proposal, the BLM will review the situation, the information provided by the R/RAC, and make a decision on how to proceed.

Unlike other BLM planning processes, there is no formal protest or appeal process for the adjustment of fees. Should there be specific concerns over the fee adjustment or the information presented in the business plan, the public is strongly encouraged to work with the BLM to resolve these concerns and ensure their concerns are elevated to the R/RAC. Additional information on the business plan and the public-participation processes can be found on the El Centro Field Offices' ISDRA website <http://www.blm.gov/ca/st/en/fo/elcentro/recreation/ohvs/isdra/dunesinfo/docs/isdrabp.html>.

Sincerely,

/s/ Thomas Zale

Thomas Zale
Field Manager, El Centro Field Office

Readers Guide to the Document

This document, the Imperial Sand Dunes Recreation Area (ISDRA) Business Plan – Proposed Fee Adjustment 2013, provides the description, proposal, and analysis of, recreational-fee adjustments within the ISDRA fee area.

It is strongly recommended that this document be read in the order presented. Key information regarding the recreational-fee adjustment process, the BLM's authority to charge recreational fees, and the policy and planning framework i.e., the rationale for fees, are presented early in the document. These items establish the basis for the proposed-fee adjustment and provide an important understanding in how ISDRA management has evolved and what is needed to support on-going OHV-recreation opportunities in the area.

Chapter One: Introduction

This chapter describes the overall purpose of a business plan and specifically this project: the adjustment of ISDRA recreational fees. It provides basic information on the BLM's authority for charging these fees and the processes that are required by regulation to create and/or adjust such fees. This chapter concludes with a detailed description of the regulation, policy, and planning that have shaped management of the ISDRA -- and makes the collection of fees necessary to meet the goals and objectives established for the area.

Chapter Two: Project Area

This chapter provides an overall description of the project area – the ISDRA fee area. For the purposes of this document, the term ISDRA refers to the fee area unless specifically noted. The area description includes basic information on the facilities and services, overall recreation opportunities, and ISDRA visitors. This chapter is supported by additional information concerning specific areas of the ISDRA in the appendices.

Chapter Three: Management and Budget

This chapter outlines the specific management needed to meet the goals and objectives presented in the previous chapters. It includes an overview of the levels of service needed and past expenditures used in ISDRA management. In addition, a detailed explanation of the funding sources is provided, along with an explanation of how “no action” i.e., no fee adjustment, would impact opportunities and experiences through changes in levels of service.

Chapter Four: Fee Proposal

This chapter includes the fee-adjustment proposal itself – for visitor fees. In addition to this information, the chapter provides a financial analysis i.e., what revenues can be expected, and a market assessment of how the proposed fees compare with similar fees for similar opportunities.

Chapter Five: Social and Economic Impacts

This chapter examines the impact of the proposed-fee adjustment on several social and economic factors, such as discussions of impacts to low income, impoverished and/or minority populations, and local businesses.

Chapter Six: Public Participation

This chapter describes the public participation process conducted while preparing this document and the public information and outreach program that would continue after establishment of the adjusted fees. Included in this chapter is a brief explanation of changes to the document between the draft and final versions. This chapter of the document is supported by two previously published documents: the ISDRA BP Communication Plan and the ISDRA BP Public Comment Content Analysis. Both are cited in the body of this document and referenced accordingly.

References

This section of the document provides a full citation of all references cited within the document.

Acronyms, Abbreviations and Glossary

This section of the document spells out any acronyms and abbreviations used, as well as defines select terms to aid in understanding.

Appendices

Various appendices are included to provide information needed to support the business plan, yet are not critical in understanding the proposal. This information is referenced, as appropriate, throughout the document.

Figures, Calculations and Rounding

Figures e.g., visitation numbers, expenditures, revenues, etc. contained in the document come from a variety of sources including previously published documents , such as annual fee reports, OHMVR grant applications, and internal BLM systems such as Recreation Management Information System (RMIS), Central Billing System (CBS), Financial and Business Management System (FBMS), etc. There are known limitations with these figures, including that systems for tracking figures have changed through the course of the historic data presented. In addition, any numbers retrieved from these systems are only as accurate as the data entered. As such, the figures used throughout this document are the most accurate available through the BLM budget tracking system.

Many calculations are made throughout the document. These calculations generally serve to show trends and predict anticipated figures, and should only be viewed as a reference to explain elements of the business plan rather than exact figure and expectations. To reduce human errors, calculations have generally been made with Microsoft Excel spreadsheets.

All numbers presented in the document have been rounded to aid in ease of reading. The level of rounding depends on the magnitude of the number and whether the number appears in a table or in the body of the text.

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Chapter 1: Introduction

A Business Plan, as defined by BLM policy (BLM, 2006), is a written document that describes the objectives of a fee program and how those objectives will be achieved through identification of a fee structure and schedule. The plan is tailored to address the complexity of the venture described and the major features of the financial and environmental surroundings within which it will be implemented. These plans are a required component for establishing and adjusting recreational-use fees for public lands (BLM Manual 2930) and should be used in determining the appropriateness and level of fees to ensure that fair value for recreation opportunities is received.

According to BLM policy (BLM Manual 2930), the Business Plan must include, but not be limited to, descriptions and analysis of the level and type of development; type, season, duration, and intensity of visitor use; compliance and enforcement capability; partnerships; stakeholder input; and impacts to underserved communities and local businesses. In addition, the business plan must outline a communication and marketing strategy. As such, this document fulfills these requirements while demonstrating a method to pay for and implement mandated environmental and legal requirements, yet remains responsive to the OHV community in a manner that will keep the ISDRA open to the recreating public.

This document focuses solely on the fee area related to the Imperial Sand Dunes Recreation Area (ISDRA) and essentially updates the existing Business Plan (Casey, 2003) in order to adjust the fee structure and schedule to ensure sustainable revenue streams that will allow for continued recreational opportunities and experiences within the area.

1.1 Authority

The Federal Lands Recreation Enhancement Act (FLREA; PL 108-447, Dec. 8, 2004) affords BLM the authority to implement fee programs for recreational use of public lands. Furthermore, the act specifically allows (Section 803[h]) the BLM to issue and collect a fee for Special Recreation Permits for specialized recreation use of public lands including motorized recreational vehicle use – this is the currently implemented method for fee collection.

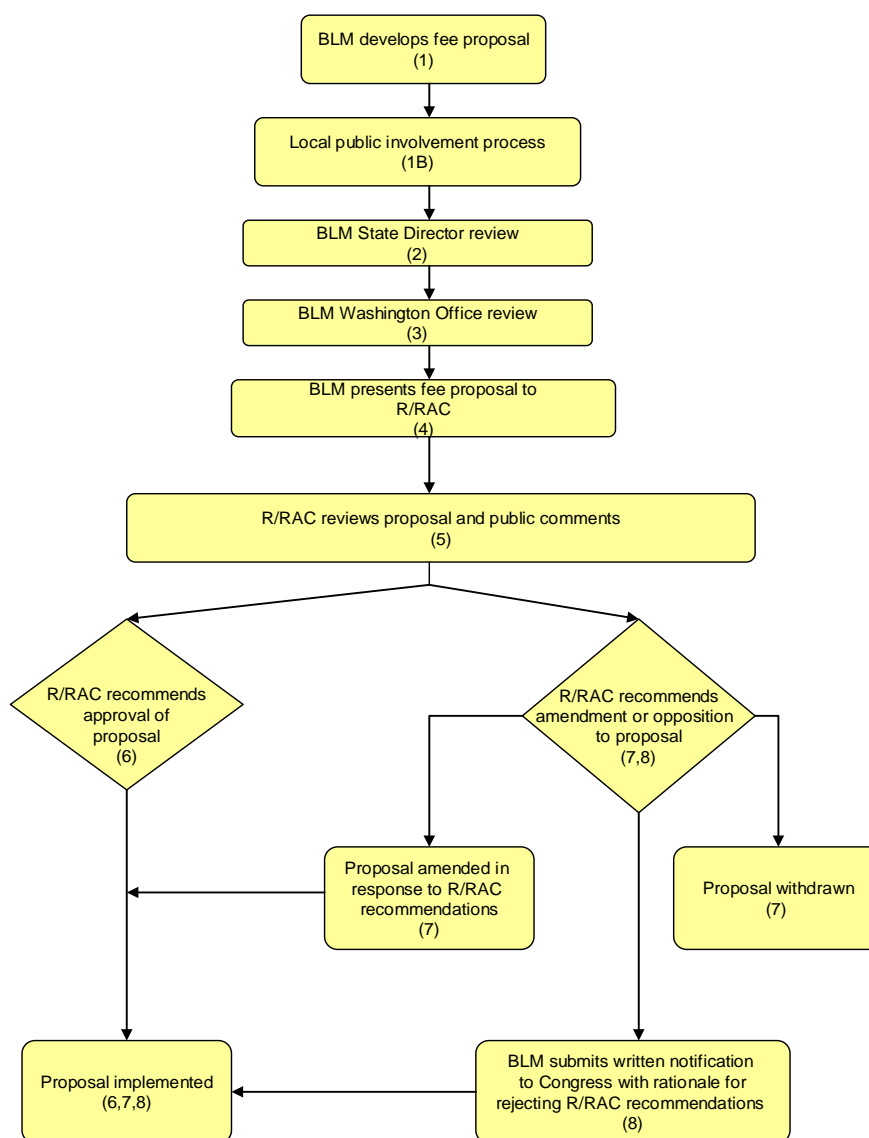
Beyond FLREA, BLM must comply with all other relevant laws, rules and regulations and internal policy including, but not limited to:

- Federal Land Policy and Management Act (1976);
- Federal Advisory Committee Act, as amended (1972);
- 43 CFR (Code of Federal Regulations) 2930;
- BLM Manual 2930 - Recreation Permits and Fees (BLM, 2006); and
- BLM Handbook H-2930-1 - Recreation Permit Administration Handbook (BLM, 2006)

1.2 Process

Establishing or adjusting existing fees, as is the case in the ISDRA, are processes governed by direction provided in FLREA (PL 108-447). In order to meet these statutory requirements, the Secretary of the Interior and the BLM created policy guidance to ensure that recreation-fee proposals and adjustments follow an appropriate “Review and Approval Process.” This process is established in BLM Manual 2930 (BLM, 2006) and further discussed in BLM Handbook H-2930-1 (BLM, 2006). The process includes several components of internal review and approval, along with several elements of public participation¹. Depending on the type of fee established, the process also may include presentation to, and a recommendation from, the Recreation Resource Advisory Council (R/RAC). This process is best illustrated by the following flow chart:

BLM Recreation Fee Proposals, Approval Process



¹ Some elements of public participations are governed by various laws, including Federal Advisory Committee Act

The BLM Fee Proposal (item one in the above flow chart) is essentially a business plan i.e., this document, which must include at a minimum a description of the fee area, details on the proposed fee structure and schedule, a financial analysis of predicted fee revenues, a market analysis of how the fee compares to similar public and private facilities, and a description of how the public will be informed of fee expenditures.

The public-involvement process (item 1b in the flow chart above) is steered by a set of minimum public-involvement steps established through policy. Additional details concerning these public-participation steps can be found in the Public Participation section of this document (*Chapter 6 – Public Participation*) and in the separately published ISDRA BP Communication Plan (BLM, 2013).

It should be noted that FLREA requires R/RAC involvement (items 4 – 8) for the creation or adjustment of Standard and Expanded Amenity Fee. BLM Manual 2930 expands the direction in FLREA to include fees established for “Special Area” individual SRPs. Regulation and policy do not require the R/RAC to review or provide recommendation on other SRP fees, including Commercial SRPs for vendors.

This fee-adjustment proposal will be presented to the R/RAC² and a recommendation sought on the fee amounts. If the R/RAC recommendation matches or affirms the proposal, the proposal will be implemented as is. Should the R/RAC recommend a modification to the proposal and the State Director, or designee, agrees with the recommended modification, the modified proposal can then be implemented (or it can be withdrawn). If the R/RAC does not affirm the proposal, the State Director, or designee, must determine if the Field Office would still like to move forward with the original proposal. If the State Director, or designee, wishes to pursue the original proposal, the National Recreation and Visitor Services Division will coordinate with the field and Department of the Interior to issue the Federal Land Recreation Enhancement Act required written notification to Congress for rejecting the R/RAC recommendation.

1.3 Project Description

This project, a 5-year business plan, is the fee-adjustment proposal to increase visitor permit fees within the ISDRA fee area. The Draft 2012 Business Plan (BLM, 2012) had also addressed the need to adjust vendor permit fees; however, these adjustments have been removed from this fee adjustment proposal³. The primary purpose of the plan is to provide a consistent and commensurate level of service by supplementing declining grants and base funding with increased fee revenue. A complete description of the project area, including facilities, trends in visitation, and visitor demographics is provided between *Chapter 2* and *Appendix A – Detailed Area Information*. The specific fee-adjustment proposal is explained in detail in *Chapter 4*.

² Should the R/RAC fail to meet, the Desert Advisory Council has the ability to provide a recommendation to the State Director on the fee-adjustment proposal.

³ Adjustments to vendor permit fees have been removed from the fee adjustment proposal as, under BLM policy they are subject to a substantially different approval process and some of the information required to make a decision is not yet available.

1.4 Overarching Management Guidance

All BLM management actions are guided by regulations that have been distilled through policy and guidance, and finally implemented in land use and activity-level planning decisions for a specific area or unit. It is these tiers of regulation, policy, and planning that provide the management direction for the ISDRA and ultimately support the rationale and justification for fees to meet these goals and objectives. All levels of regulation, policy, and planning have at some time received public scrutiny through an assortment of public processes. The direction provided in these various documents can therefore be assumed to have had overall general public support.

The following sections separate regulation and national policy from specific land use and activity-level planning decisions pertaining to the ISDRA. The Project Objectives (*Chapter 1, Section 1.4.2 – Project Objectives*) section summarizes the higher-level management direction as it pertains to the recreation-fee program within the ISDRA.

It should be noted that appropriated funding and grants have not historically been sufficient to cover the costs associated with implementation actions needed to meet the intent of regulation, policy, and planning. Given the current economic climate, this fact is unlikely to change and there continues to be a need to supplement these funding sources with additional revenues, including recreational-use fees.

1.4.1 Law, Regulation, and National Policy/Guidance

There are a number of pertinent laws that guide the overall management of the ISDRA, these include the Federal Land Policy and Management Act (FLPMA) of 1976, the Endangered Species Act (ESA) of 1973, the National Historic Preservation Act (NHPA) of 1966, and the Wilderness Act of 1964 to name a few. These laws are distilled through regulation and policy that ultimately guide planning and implementation actions on the ground. One such resulting regulation is from the Code of Federal Regulation (CFR) Title 43 CFR Part 8340.0-2. This specific regulation directs the BLM to protect the resources of public lands, to promote the safety of all users of those lands, and to minimize conflicts among the various users of those lands. The tie between the ISDRA goals and objectives described below and this regulation is obvious in that a prime directive of the BLM is to provide for safety of all public lands users.

Several pertinent documents have influenced the management of ISDRA over the years, including “The BLM’s Priorities for Recreation and Visitor Services” (BLM, 2003b) and the National Management Strategy for Motorized Off-Highway Vehicle Use (BLM, 2001). These two documents have provided direction that is carried forward in land use and implementation plans as described below.

1.4.2 Land Use and Implementation Plan Conformance

The ISDRA is managed under the California Desert Conservation Area Plan (CDCA), as amended (BLM, 1980). In addition, a subsequent ISDRA Recreation Area Management Plan (RAMP; BLM 2013) has been completed to provide specific management guidance for the ISDRA. In the interim between publication of the CDCA Plan and the recent release of the 2013 RAMP, two other planning documents for the ISDRA have been completed: a 1987 RAMP (BLM, 1987) and a 2003 RAMP (BLM, 2003), the latter of which was litigated against and remanded back to the BLM and as such was never implemented.

Ultimately all ISDRA management guidance and subsequent actions stem from the direction provided in the CDCA plan (BLM, 1980). This plan, besides designating portions of the ISDRA as open or closed, also provided general direction for the type and extent of visitor services to be provided throughout the planning area. It is this visitor-service direction that has ultimately led to the levels of service seen in the ISDRA today.

The CDCA plan (BLM, 1980) specifically states in the Visitor Protection and Assistance section:

Through regularly scheduled patrols, BLM Rangers and other Visitors Services Personnel will provide the following services to aid the public in safe and enjoyable desert recreation. These services will generally be provided on the ground.

Information – Visitor Services Personnel will provide maps, brochures, and other information about the desert to the public.

Vehicle Assistance – Visitor Services Personnel will assist desert users with vehicle problems. (Services will be limited to minimum needed to gain access to “regular” services)

Emergency Medical Assistance – Visitor Services Personnel will respond to visitor medical emergencies and will provide immediate assistance. (All visitor services personnel will be trained as Emergency Medical Technicians).

Search and Rescue – Visitor Services Personnel will respond to initial search and rescue situations and direct operations until relieved by a Sheriff. (Under California law, County Sheriffs have responsibility for search and rescue operations.) Further assistance will be provided at the request of the Sheriff.

Enforcement – Visitor Services personnel will be responsible for obtaining compliance with Federal laws and regulations. In doing so, they will obtain assistance as necessary from other personnel or local law enforcement officers. The BLM Rangers are delegated Federal law enforcement officers. Visitor services personnel may also be responsible for insuring compliance with situations associated with various use permits.

The Final ISDRA RAMP (BLM, 2012) echoes the sentiment of the CDCA Plan (BLM, 1980) through its goals, objectives, and management actions. Here are some relevant sections:

Work cooperatively with the county, the contracted emergency medical service providers, and other interested agencies, to find innovative methods of providing the highest level of emergency medical service needed to adequately serve visitors to the Planning Area, as needs fluctuate. (PHS-01)

Promote safety through education about the rules and regulations within the Planning Area. (PHS-04)

Promote safety through law enforcement activities to improve compliance with the rules and regulations of the Planning Area. (PHS-05)

Improve health by addressing the air quality around established roads with the management of dust and particulates through stabilization and/or reduction in accumulation, as appropriate and practical, and the enforcement of speed limitations. (PHS-06)

Increase compliance with all laws and regulations. (PHS-09)

Provide emergency medical technician training to the permanent visitor services staff as a minimum level of emergency medical service. (PHS-11)

Provide adequate off-highway emergency medical service support to the county and visitors throughout the Planning Area. (PHS-12)

In addition to the aforementioned, the ISDRA has been operating under a 2003 Business Plan (BLM, 2003) for the last 10-years. This is discussed further under the Management and Budget section of this document (*Chapter 3 – Management and Budget*).

1.4.3 Project Objectives

The overall objective of the recreational fee project is to provide sufficient, sustainable funding to conduct operations in the ISDRA to meet the statutory requirements, make contributions towards meeting the mission goals and objectives for the agency, and achieve those overarching goals and objectives prescribed in the CDCA Plan (BLM, 1980) and the ISDRA RAMP (BLM, 2013). Ultimately, this boils down to the following items:

- Provide for and ensure safety of employees and contractors working in the ISDRA.
- Provide law enforcement at an appropriate level to improve the health and safety of visitors and protect those natural and cultural resources present in the ISDRA.
- Provide emergency medical staff to aid in care and extraction of injured visitors.
- Provide visitor-services staff to inform and educate ISDRA visitors, as well as assist in aiding visitors as needed.
- Provide and ensure appropriate access to recreational experiences is maintained – and improved when possible.
- Provide and maintain facilities and visitor service amenities to enhance the health and safety of dunes visitors and BLM staff, aid in the protection of resources, and assist in delivery of the above items.

In achieving the above objectives, specifically as they relate to recreational fees, the following measurable objectives will be used:

- Ensure fee education is widely available, at a minimum posted by each main access point, on the website, and at BLM locations. Also ensure that notification of routine fee increases are widely distributed during the season before the increases come into effect.

- Target fee compliance of 80 percent by the third year of implementation;
- Maintain or exceed the current level of off-site sales (82 percent sold off-site), thereby improving the customer experience within the ISDRA and reducing the need for fee collection staff on site; and
- Achieve permit sales over the life of the plan of an average of approximately 66,000 units per year.

1.5 Rationale and Justification for Fee

As described above (*Chapter 1, Section 1.4 – Overarching Management Guidance*) and summarized as it pertains to the recreational-fee project (*Chapter 1, Section 1.4.3 – Project Objectives*), the management of the ISDRA is guided by established planning goals and objectives that have ultimately been derived from law, regulation, and policy. In order to achieve these goals and objectives, which provide for continued recreation opportunities and experiences within the ISDRA, all major funding sources -- appropriated dollars, grants, and fees are used. However, these recreational opportunities and experiences are at risk from an overall reduction in the levels of service (described in *Chapter 3, Section 3.1 – Level of Service*) - needed to sustain these opportunities whilst continuing to provide for employee and visitor health and safety, and to protect sensitive resources - that result from declining federal budgets, uncertainties in grant funding, and a general decline in fee revenues, needed to support these services.

In an effort to maintain the recreational opportunities and experiences within the ISDRA, the BLM has explored many different options and continues to aggressively seek grant funding, submit requests for increased base and directed funding, as well as implement a wide variety of cost-saving measures. These options alone, however, are insufficient to offset the decline in revenue for all sources. In fact, recently the ISDRA has operated beyond its means⁴ and provided an overall level of service that barely achieves the aforementioned goals and objectives. As such, it has become necessary to increase fees to continue to provide a sustainable budget in which the services necessary to provide recreational opportunities and meet the established goals and objectives for the area can be achieved.

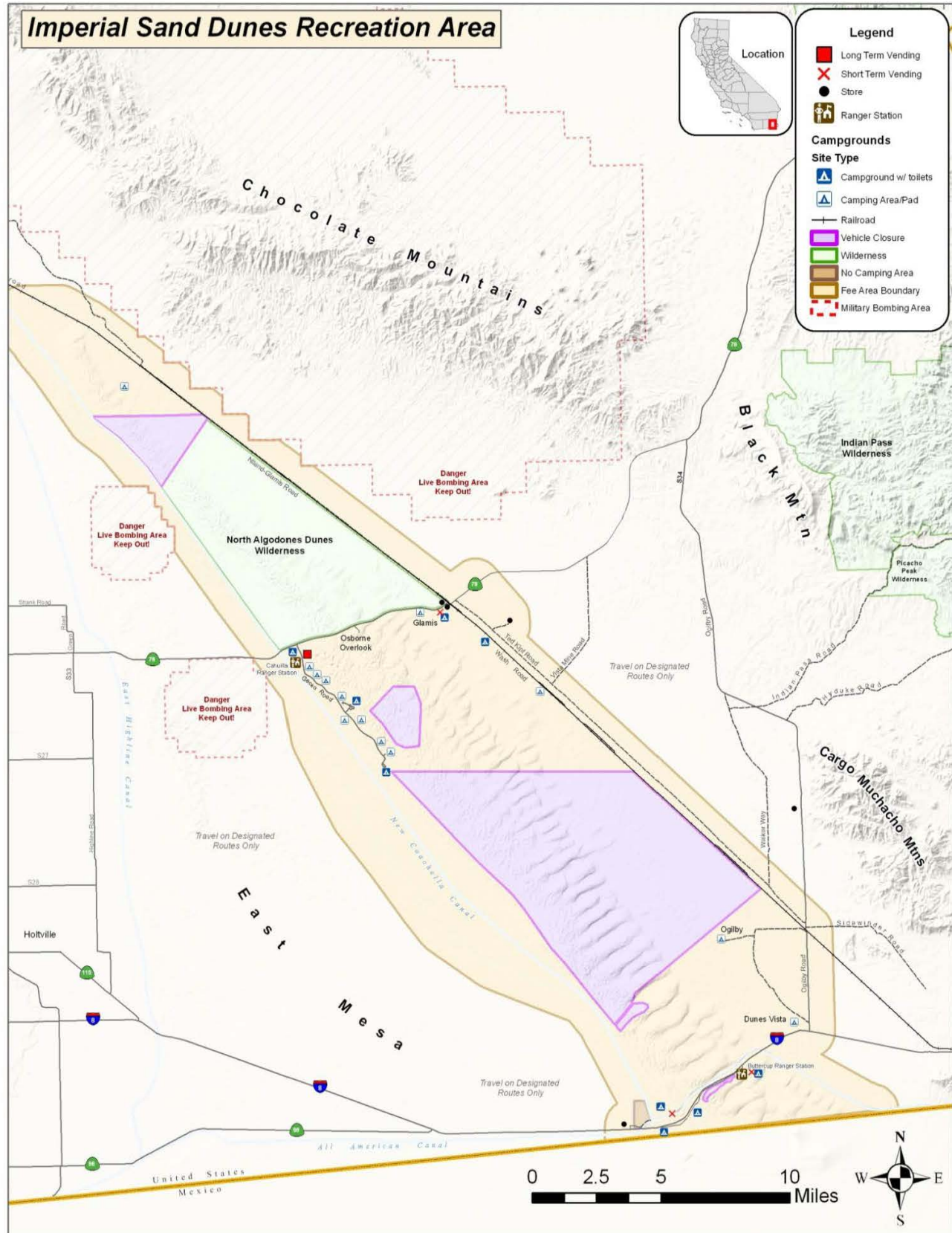
⁴ As described later in the document, the ISDRA has operated outside its allocated budget, overspending in a number of areas. Consequently, funds have either had to be reallocated or work not done elsewhere in the El Centro Field Office.

Chapter 2: Project Area

The ISDRA is located in eastern Imperial County, California. As its name suggests, the area is almost entirely made-up of inland sand dunes oriented in a northwest to southeast direction. This dune system is the largest in California, stretching from the US-Mexican border northwest for more than forty miles and at its widest is approximately five miles across. The project area, containing approximately 214,700 acres of public lands, is bisected by two major roads: Interstate 8 (I-8) and State Highway 78, which provide the primary access points to the area.

The ISDRA Special Recreation Management Area (SRMA) (164,000 acres) itself is bounded by the Coachella Canal to the west and the Union Pacific Railroad to the east. However, the area considered for fee implementation extends for a mile around this boundary, encompassing an additional 50,700 acres of public lands. This larger fee area (*Figure 2-1*) was created in an effort to avoid changing user visitation patterns i.e., maintain the normal geographic distribution of visitors – essentially having users camp outside the area in order to avoid fees (Casey, 2003). The project area - fee implementation area – is therefore the entire SRMA and the one-mile fee boundary around the SRMA. For the purposes of this Business Plan, the fee implementation area is referred to as the ISDRA unless otherwise specified.

**Figure 2-1
Project Area Map**



2.1 Area Description

The ISDRA is considered a world-class OHV area and represents one of the most popular OHV areas in the United States. It is well-known to local residents and the thousands who visit each year from the southwest and beyond. The ISDRA is the most heavily and intensively visited OHV-recreation area on public lands managed by the BLM with more than 1.2 million OHV-related visits each year. Visitation levels fluctuate tremendously, from almost zero (0) during the summer to almost 200,000 during Thanksgiving weekend. In addition, the ISDRA is recognized for its frequent use as a backdrop for commercials and movies because of its unique beauty and landscape. Furthermore, the area is also recognized for providing unique habitat for several endemic and sensitive plant, insect, and animal species. The overwhelming popularity and regional importance of the ISDRA to visitors, recreational enthusiasts, and others require careful management to protect its recreational, natural, and cultural resources.

The area contains six distinct geographic areas of visitation, with the most intensive visitation occurring from State Highway 78 south to the Mexican border. The areas, moving north to south, are as follows; Mammoth Wash, Glamis, Gecko Road, Ogilby, Grays Well (Buttercup), and Gordons Well (Dunebuggy Flats). In addition to the areas with notable visitation, the ISDRA also includes the North Algodones Dunes Wilderness established by the 1994 California Desert Protection Act.

Facilities in the aforementioned areas vary greatly from none to paved roads, groomed camping pads, and vault toilets. Visitors to all areas can, however, use these facilities as they travel throughout the dunes. Furthermore, all areas are visited by, and have access to, visitor services personnel, emergency medical staff, and law enforcement. Each of these areas is described in greater detail in *Appendix A – Detailed Area Information*.

The following two lists summarize the facilities and services provided within the ISDRA. The policy and planning direction that has led to the construction of these facilities and establishment of these services is described in detail in *Chapter 1, Section 1.4 – Overarching Management Guidance*.

Facilities provided in the ISDRA can be summarized as:

- nearly 80 acres of groomed camping pads, vending pads, and trash collection areas;
- 61 vault toilets;
- more than 17 miles of maintained routes;
- a bridge over the All American Canal connecting portions of the ISDRA;
- numerous visitor information signs and interpretive kiosks;
- sensitive resource protection fencing and signage;
- communication infrastructure;
- two permanent ranger stations, including parking areas and one temporary visitation-contact station used on holiday weekends;
- a watchable wildlife area and wilderness access point; and

- a scenic overlook.

Services provided in, and for, the ISDRA recreation include, but are not limited to:

- law enforcement presence to protect resources and provide for visitor and staff health and safety;
- visitor service staff training to conduct search and rescue efforts and provide basic emerging medical services;
- visitor services staff to provide area information and conduct interpretive programs – including maintaining an active Facebook page, and ISDRA specific website;
- sanitation services, including vault-toilet pumping and cleaning, as well as trash collection and removal;
- natural and cultural resource monitoring, inventory, and protection work;
- administrative services to manage ISDRA vendors; and
- administrative services to provide overall management, direction, and supervision of the ISDRA program.

It should be noted again that the area is currently managed as part of the California Desert Conservation Area Plan, as amended (BLM, 1980) and the Imperial Sand Dunes Recreation Area RAMP (BLM, 2013). Further implementation guidance for the recreation-fee program is provided by the Imperial Sand Dunes Recreation Area Business Plan (Casey, 2003).

2.2 Recreation Opportunities

A multitude of recreation opportunities and experiences are available in the world-renowned ISDRA. The entire area, with the exception of the North Algodones Dune Wilderness, is designated as “open” for OHV use – meaning that OHV travel can occur off designated routes and cross country. The Wilderness area is closed to all motorized and mechanized equipment – including OHVs. And as a result of a negotiated settlement agreement between the BLM and a coalition of environmental groups, several areas of the ISDRA are administratively closed to all vehicles for the protection of Peirson’s Milk-vetch. The following acreages (*Figure 2-2*), then, are available for recreation:

Figure 2-2
Acre Available for Recreation (motorized and non-motorized)⁵

Area	Acres
Open OHV recreation	87,713
Administratively Closed to Vehicles	49,224
North Algodones Dunes Wilderness	26,098
SRMA Total:	164,209
Fee Area Outside of SRMA	51,896
Total:	214,930

⁵ Data from Imperial Sand Dunes Proposed RAMP / California Desert Conservation Plan Amendment and Final EIS, 2012, page 2-94 table 2-19

The administrative closure explained above will remain in effect until a new RAMP (BLM, 2013) is approved by the court and implemented. It is hoped that this new plan will be fully in effect prior to implementation of any fee adjustments. However, neither the RAMP nor this business plan is dependent on each other – and should the RAMP be held up in litigation, but not the business plan, adjusted fees would be implemented on-schedule.

Besides OHV-recreation opportunities and opportunities for solitude and isolation provided by the Wilderness area, a number of other recreation opportunities and experiences may be enjoyed in the ISDRA. These include activities associated with OHV visitation, such as overnight camping and dispersed use, and activities that may or may not be associated with OHV visitation from wildlife watching to scenic appreciation and photography.

2.3 Recreation Use

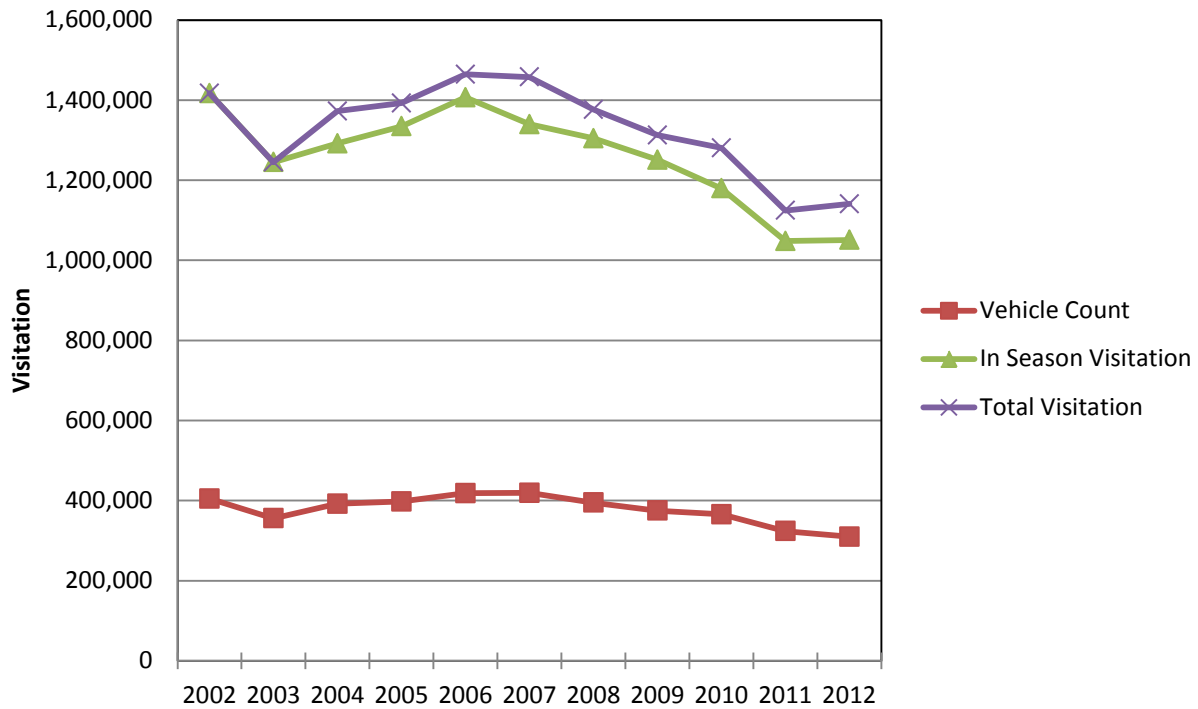
Recreational use in the ISDRA rests in extremes. During the hot summer months visitation is low with visitors mainly stopping along major highways to take a glimpse at the sand dune ecosystem. In the fall, winter, and spring - October through May⁶ - visitation rises dramatically, peaking during holiday weekends (Halloween, Thanksgiving, New Year's, and Presidents' Day) with an excess of 200,000 visitors. Therefore, visitor use is best divided between in-season visitors and off-season visitors. The majority of in-season visitors are engaged in overnight camping and OHV recreation, although other recreational opportunities exist, including scenic appreciation, wilderness recreation, and cultural-resource viewing.

The following graph (*Figure 2-3*) charts overall visitation for the last 10 years showing a series for actual vehicle count, in-season visitation, and off-season visitation. A "visit" occurs when one person enters public land and engages in a recreational activity for any period of time. (All visits are assumed to be recreational due to the nature of the ISDRA.) The figures presented below have been, and continue to be, collected from magnetic vehicle counters placed at the major access points. The raw data that is collected (noted on the chart as the "Vehicle Count" series) is therefore the number of vehicles entering the ISDRA. This is then multiplied by 3.5, which has been determined to be the average number of vehicle occupants. Data is collected weekly, recorded, and reported into the BLM's Recreation Management Information System (RMIS). The figures used in this section are derived directly from the RMIS database.

There are known limitations of this data. For example, any administrative or non-recreational use is counted, as are any visitors who cross one counter and then travel to a different area of the dunes and cross another counter (i.e., the same vehicle may be counted multiple times). Conversely, there are many areas throughout the dunes where visitors do not cross main access points and therefore are not included in the data set. Given these limitations, this data is presented as a reference to show trends in visitation, rather than a factor by which fee revenues could be calculated.

⁶ Although visitation sharply declines after Easter or when temperatures exceed 100°F

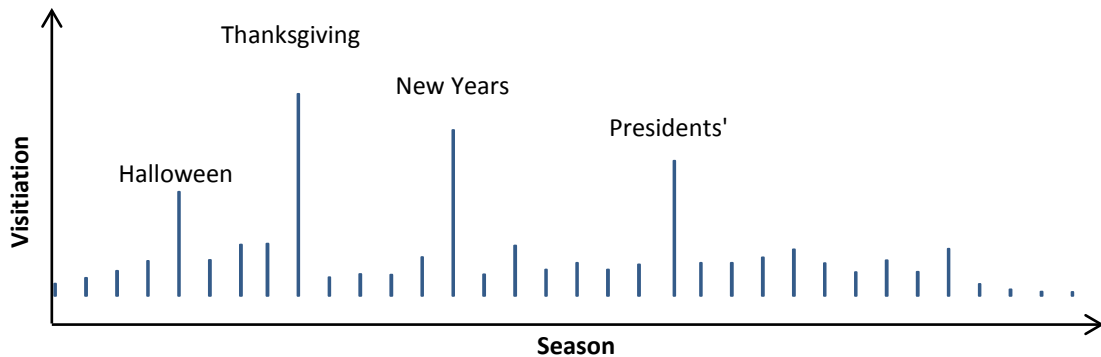
Figure 2-3
ISDRA Visitation 2002 - 2012⁷



It is evident from the data that overall visitation has been declining since its high of 1.45 million visits in 2007 to the lowest visitation numbers in the last 10 years in 2011 (approximately 1.12 million).

Looking specifically at any one year (*Figure 2-4*), it can be seen that visitor use peaks over the holiday weekends during the season. In fact, approximately a quarter of all visits occur over these four main holidays. These spikes in visitation over the holiday weekends lead to a change in several social and managerial considerations of the ISDRA. These are discussed further under the Management and Budget Section of this document (*Chapter 3 – Management and Budget*).

Figure 2-4
ISDRA Weekly Visitation Fluctuations⁸



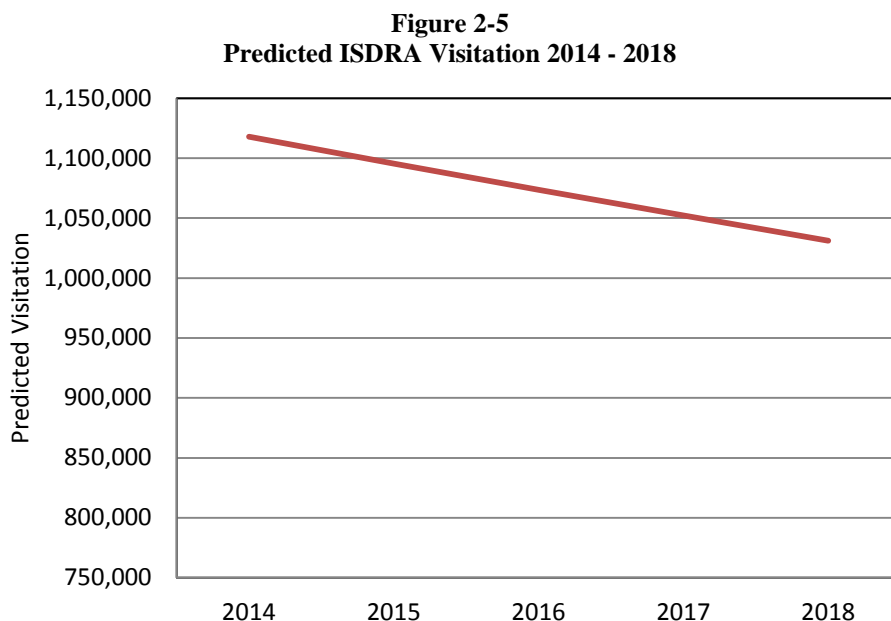
⁷ Visitation figures derived from the BLMs Recreation Management Information System

⁸ Date from FY2011

Many factors can affect visitation, ranging from the weather e.g., a longer hot season lends itself to low visitation; to the economy e.g., individual income available for discretionary spending is lower. Certainly a correlation can be drawn between recessions in the U.S. economy in 2002 and 2007 and overall visitation.

The data from the last 10 years shows an average visitation of 1,326,000 visits per annum (1,261,000 visits in-season) extrapolated from an average vehicle count of 378,000 vehicles. It's worth noting that on average, 72,000 permits are sold per year (*Chapter 3, Section 3.2.3 – Fee Revenue*) meaning that if all vehicles entering the ISDRA were required to purchase a permit and compliance was at 100 percent, each vehicle crosses a vehicle counter an average of 5.25 times per visit⁹. This poses a question regarding visitation and compliance – that either visitation is overestimated by a least a factor of five or that compliance is significantly lower than expected. These issues are further discussed in *Chapter 3, Section 3.3.3 - Fee Revenue*.

The trend in visitation can be averaged over the last 10 years to an estimated 2 percent decline in visitation¹⁰ per year. There is no assumption that this declining trend will stabilize. As with all discretionary spending (i.e., recreation), when the activity becomes too expensive (i.e., fees, gas prices, equipment costs) and the economy does not provide for more discretionary income, the activity simply decreases or ceases. This 5-year business plan must therefore assume a continuing trend of a 2 percent decline in visitation, as shown on the following graph (*Figure 2-5*).



⁹ It's known that compliance is not at 100 percent and that a number of vehicles that cross the counters are not required to have a permit. Thus, a more accurate calculation (for which data is not available) would reflect a higher number of vehicle counter crossings per vehicle.

¹⁰ It should be noted that in the last 10 years no significant change in management or fee structure has occurred. A management change has the capacity to dramatically alter this trend.

Considering the above predication, average visitation over the life of the business plan would approximate 1,074,000 visits, which equates to an average of 307,000 vehicles being counted per year.

2.4 Visitor Demographics

Visitor demographics explore a number of factors concerning ISDRA visitors. These include the spread in age, sex, ethnicity, education level, and income. Since the completion of the existing 2003 Business Plan, there have been a number of visitor studies conducted in the ISDRA. Most notably, these include the Dunes Survey (Imperial Sand Dunes, 2005), A Profile of the 2006 Visitor to the Imperial Sand Dunes Recreation Area (Haas, 2008), and the ISDRA Visitor Survey (University of Idaho, 2011).

The following table (*Figure 2-6*) shows information from A Profile of the 2006 Visitor to the Imperial Sand Dunes Recreation Area (Haas, 2008):

Figure 2-6
Profile of the 2006 ISDRA Visitor

Variable	Percentage of Visitors
<i>Gender</i>	
Female	28%
Male	72%
<i>Level</i>	
< high school grad	1%
HS grad or GED	21%
Post-HS business or trade school	13%
Some college	35%
College grad	22%
Some graduate school	4%
Advanced graduate degree	4%
<i>Ethnicity / Race</i>	
White	83%
Hispanic, Latino, Spanish	13%
American Indian or Alaskan Native	2%
Asian	1%
Other	1%
Black or African American	0%
Native Hawaiian or Pacific Islander	0%
<i>Income Category</i>	
Less than \$20K	1%
\$20,000 - \$39,999	7%
\$40,000 - \$59,999	16%
\$60,000 - \$79,999	21%
\$80,000 - \$99,000	23%
\$100,000 - \$119,000	14%
\$120,000 or more	17%

As can be seen from the table above, nearly three quarters of all ISDRA visitors in 2006 were male. This statistic was again confirmed in the University of Idaho study (University of Idaho, 2011), which found that 69 percent of survey respondents were male. Furthermore, in the 2006 study, most of the visitors, 80 percent, assigned themselves to the ethnic category of Caucasian and the majority of visitors had some level of college education. Income levels were fairly evenly spread between the \$40,000-per-year and \$120,000 per-year categories – with only 8 percent reporting incomes of less than \$40,000.

The same study (Hass, 2008) also asked where people were from, and people's age. The results were that the average distance travelled to get to the ISDRA was 205 miles, with a range from three miles to 2,800 miles, alluding to the fact that the many of visitors originate from San Diego, Los Angeles, the Inland Empire, and Phoenix. The study found that the average age of an ISDRA visitor was 40, with a range of 3 to 76 years. The University of Idaho study found that about one-third of groups camping had children under the age of 12, while another 22 percent were camping with teenagers (13-17 years old) – meaning almost half of all groups visiting were family groups travelling with minors.

Chapter 3: Management and Budget

As previously described (*Chapter 1 - Section 1.4 - Rationale and Justification for Fee*), management of the ISDRA is driven by a mix of regulations, policies, and planning documents. This assortment of direction sets the framework for ISDRA management operations and establishes the broad goals and objectives to be achieved. There is, however, no specific direction included in these policies and planning documents dictating how each of the aforementioned objectives will be attained, or prescriptions as to how many employees, how many vehicles, etc. should be used to achieve the work. As such, management of the ISDRA has evolved over the last 30 years through trial and error, experience, and professional judgement. The success of the management of the ISDRA that has evolved over this time is captured by a recent independent survey, which reports that of those surveyed, 82 percent reported being satisfied with the facilities, services, and opportunities in the ISDRA (University of Idaho, 2011). The accumulation of this management knowledge has led to the current management situation, which separates ISDRA into five main business lines, as follows:

Administration and Management: Management and support services are engaged in everything from employee supervision to contract administration. Although the most time-intensive positions and greatest costs are located directly in the field, it's not uncommon for staff from the District, State, Washington or the National Operations Center to assist in management of the ISDRA. With the exception of a few staff who spend considerable time working on ISDRA, the costs associated with administration are usually reported as a percentage of the overall operating budget i.e., administrative costs. For example, the National Operations Center currently uses 18.4 percent to account for these various administration costs ranging from keeping the lights on in buildings, to replacement costs of computers, and from the costs of setting up contracts to the untraceable minutes of time (less than 15-minute increments) used in the processing of time sheets. These costs, along with contracting costs for fee collection and administration (sometimes reported as "Fee Program Management") are included in this business line. For the life of the business plan, these management and supports services can essentially be considered static i.e., in order to operate the ISDRA, these positions and the associated operational costs are required. It is ultimately foreseeable that visitation and management complexity would drop to a level that would eliminate the need for some of this business line. This threshold however, is not anticipated to be breached in the life of this plan given visitation predications and the ongoing management complexity of the area.

EMS and Visitor Services: emergency medical technicians and appropriately trained park ranger staff whose primary duty is the well-being of ISDRA visitors. In addition to emergency medical services, other visitor services provided include interpretation, safety education, resource management, fee implementation, and as needed, assistance with general maintenance and operations. Elements of this business line often cross with those in Maintenance and Operations, as well as Resource Protection and Monitoring.

Law Enforcement: law enforcement officers and supervisors (e.g., chief rangers) who are principally responsible for public health and safety and protection of resources through education (i.e., visitor contacts) and enforcement (e.g., citations, arrests, etc.). Due to the nature of the work, employee safety is a significant concern and as such, minimum staffing levels are often driven by the need to provide back-up and ensure swift response times. Frequently the law enforcement business line assists in EMS and Visitor Services and less frequently, but still critically, with Resource Protection and Monitoring.

Maintenance and Operations: maintenance work critical to maintaining access to the ISDRA and the upkeep of existing facilities ranging from road and camping pad repair to routine cleaning of vault toilets. Work is often achieved through a combination of in-house labor and contracts. Besides upkeep of facilities, this business line is critical to maintaining the visitor experience and the protection of resources e.g., ensuring facilities are clean and safe to use and the aesthetics of the area are not obscured with litter.

Resource Protection and Monitoring: work in various disciplines required to implement resource specific projects from biological monitoring to Wilderness management. Recreation fees cannot be used for biological monitoring because it is prohibited in FLREA, however, it is critical to achieving the goals and objectives established for the ISDRA – most notably the continued access and opportunity for OHV-related recreation.

For clarification, the above and following generally discuss the overall management of the recreation area and program. This is inclusive of the management of the fee program but extends to many different aspects of management. As such, the business lines presented differ from those “expense type” routinely reported in ISDRA Recreation Fee Reports.

3.1 Levels of Service

Establishing the level of service i.e., the combination of the five aforementioned business lines needed to meet the goals and objectives set out for the ISDRA, isn’t an exact science. Complicating the issue further, no specific thresholds of performance have been established in any previous planning document. Therefore, an amalgamation of all of the BLM’s management guidance must be used to establish the appropriate level of service given the loosely established goals and objectives for the area, as well as the support that must be afforded to ensure employee and visitor health and safety.

Much like the overall management of the ISDRA, a combination of professional judgement, experience, and trial and error has led to an understanding of the basic requirements of each business line¹¹. As such, what follows is the basic level of service that must be maintained in order to achieve the

¹¹ Due to the complexity of management and the significant public investment in infrastructure and employees, a zero-base budget – where each line item is individually justified, would be an unrealistic presentation of the minimum requirements to manage the ISDRA. As such, what’s presented here is the basic acceptable level of service in order to maintain infrastructure and provide for basic employee and visitor health and safety. It should be noted that due to changes in staffing and budget, this standard is often not achieved.

aforementioned goals and objectives (*Chapter 1, Section 1.4 Overarching Management Direction*) at the most basic level¹² for the five business lines described previously. It should be noted that due to the dramatic shift in visitation during holiday weekends, the needs for those weekends are presented in addition to the basic operations.

Administration and Management: The administration and management line of business is one of the hardest to pin down in terms of actual cost. There is one management position tied to the dunes: the dunes manager. This is a full-time (2,080 hours of service annually) permanent position. Beyond that, El Centro's vendor specialist, although primarily providing management of vendors in the ISDRA manages non-ISDRA vendor permits for approximately 15 percent of the time and performs other duties as needed. As such, an average of 1,768 hours of service is provided by this position to dunes management. And of course, the El Centro Field manager serves as the dunes authorized officer who not only makes official decisions, but is the conduit through which management is communicated through the various levels of the BLM and certain external interests. It's estimated that 416 hours each year are dedicated to ISDRA management (this equates to approximately one day each week).

In addition to the three specifically mentioned positions, administrative support is required from many other sources – some who directly charge each hour to an ISDRA revenue stream and some who are funded separately for their overall roles. These positions range from timekeepers to contracting officers and often, without their support, work on the ground would cease. Figuring in these management and administrative services -- that are often not seen by the visitor -- into the overall picture of how the ISDRA is managed, and ultimately associating individual costs with these services, would not provide any added value to the business plan. As such, for the purposes of this document, with the exception of the three specifically identified positions, the National Operations Center administration rate of 18.4 percent is used to estimate the budgetary impact of these services, including labor and administrative operations¹³ to the ISDRA.

EMS and Visitor Services: Routine in-season staffing (i.e., non-holiday weekends) requires 280 hours of service per week, or 9,520 hours over the season¹⁴. This provides for four days of EMS coverage with five trained park rangers and one shift supervisor. In addition, this provides for one interpretive park ranger.

¹² The Draft 2012 Business Plan (2012, BLM), and various iterations of this document considered a higher level of service than is presented here – in excess of \$5 million. These iterations have subsequently been removed as a result of public sentiment that the cost exceeded the demand for these services.

¹³ Administrative operations are costs that include postage, paper, printing, utilities, etc.

¹⁴ A season is on average 34 weeks long

Holiday weekends require on average¹⁵, an additional 1,856 hours of service, or 464 hours per holiday weekend. This equates to an additional five staff providing EMS and visitors services across the ISDRA during these busy periods.

Routine off-season staffing requires 2,880 hours of service. During this time, staff is training and preparing for the following season. Often these staff members are involved in the grant application and management program, along with other administrative tasks that are not covered by the Administration and Management business line. In order to reduce the budgetary impact during the off-season, these staff members are, when possible, sent on details or fire assignments where their labor and operations are not charged to the ISDRA. There is no guarantee these opportunities will exist and therefore these potential cost savings are not reflected in this document.

Due to the unique environment of the ISDRA, specialized equipment is often needed to support EMS and visitor services work. As such, throughout the course of a season (both routine work and holidays), three sand rails (rescue buggies), and three upgraded trucks are routinely used. Additional operational costs for this line of business include travel and per diem, medical supplies, and equipment maintenance.

Law Enforcement: Routine in-season staffing requires 276 hours¹⁶ of service per week, or 9,384 hours over the season. This provides for seven days of coverage with two to four rangers (depending on day/time) working 75 percent or more of their shifts either patrolling the ISDRA or on ISDRA cases¹⁷ and a shift supervisor who spends between half and all of a shift on ISDRA-related management. In order to provide this level of service, a minimum of eight vehicles specially equipped for law enforcement are needed.

Holiday weekends require¹⁸, on average, an additional 11,760 hours of service, or 2,940 hours per holiday. This equates to an additional 13 to 22 rangers (depending on time of day) either patrolling the ISDRA or working on ISDRA cases during the holiday period¹⁹. To support this level of service, 22 primary law enforcement vehicles are needed.

Routine off-season staffing requires approximately 20 percent of in-season staffing levels (994 hours of service). Some of this time (mostly at night) is spent patrolling the ISDRA; the remainder is spent completing case work and preparing for the following season. In order to reduce the budgetary impact during the off-season, staff, when possible, accept details where

¹⁵ Averaged depending on where the holiday falls and location additional personnel are sourced e.g., a staff member detailed in from a neighboring field office costs less in travel expenses than one arriving from several states away.

¹⁶ Based on an eight-hour shift, considering approximately two hours per shift for travel and routine employment administration e.g., time sheets, credit card statements, etc.

¹⁷ Includes associated paperwork, transport to county facility, court appearances, etc.

¹⁸ National BLM Law Enforcement policy requires the BLM to bring in an additional 35 law enforcement rangers during national incidents i.e., holiday weekends.

¹⁹ The hours presented also include the average time required for additional law enforcement personnel to travel with their equipment to the ISDRA for the duration of their details.

their labor and operations are not charged to the ISDRA. Again, there is no guarantee these opportunities will exist and therefore these potential cost savings are not reflected in this document.

Due to the unique environment of the ISDRA, specialized equipment is often needed to support law enforcement work. As such, throughout the course of a season (both routine work and holidays), two sand rails, four UTVs, and six ATVs are routinely used. Additional operational costs for this line of business include travel and per diem, law enforcement equipment, and equipment maintenance.

Maintenance and Operations: Year-long staffing requires 11,232 hours of service to repair and maintain the existing infrastructure within the ISDRA. This equates to three heavy equipment operators, one worker, one engineering technician, and one supervisor – all of whom spend 90 percent of their time working on items within or for the ISDRA. The bulk of the work is maintenance of existing infrastructure from grading roads and camping pads to clearing sand.

In-season staffing is achieved through the addition of 3,117 hours of service provided by seasonal workers. These workers are primarily responsible for the maintenance and service of visitor facilities, such as restrooms and ranger stations.

In addition, contracts provide specific services such as toilet pumping and trash removal. These contractors are a key component of ISDRA management and are required to provide the basic level of service.

As with most maintenance on public lands, heavy equipment is frequently needed to achieve the work. Some of this equipment is owned and maintained by the BLM and some is contracted for specific projects. Costs associated with this equipment, along with other operational costs, such as signage, cleaning chemicals, toilet paper, etc. are all rolled into this business line.

Resource Protection and Monitoring: Staffing for this business line is tied to a number of factors, including current planning, resource concerns, and not least, the weather. More often than not, this work for the ISDRA is achieved through other federal revenue streams within the agency that don't directly impact the ISDRA fee budget. There are however, specific items tied directly to OHV-related recreation that need to be included. This work – monitoring²⁰ – generally requires two to three people for two to four months throughout the year (an estimated average of 1,040 hours).

The following table (*Figure 3-1*) summarizes and attaches a dollar amount to the above narrative in terms of Full Time Equivalent (FTE)²¹ employees and operational costs for which the El Centro Field

²⁰ This monitoring is required in order for the ISDRA to remain available for recreational OHV use.

²¹ Full Time Equivalent is a unit that indicates the workload in a way that makes these workloads comparable across various contexts. One FTE does not necessarily equate to a single employee, but may be made up of two half-time employees, or a number of part-time employees. In the context of ISDRA management, it often equates to full-time permanent employees, seasonal employees, or employees working on short details.

Office is responsible for²². The FTE is used as an expression of the level of service, as all other services, from maintaining toilets to distributing public information on Facebook, require some measure of workload i.e., time.

Figure 3-1
Level of Service (Full Time Equivalents and Operations)²³

Business Line	Level of Service	Estimated Average Cost
Administration & Management		
Labor	2.05 FTE	\$235,000
Operations		\$815,000
EMS & Visitor Services		
Labor	6.85 FTE	\$568,000
Operations		\$144,000
Law Enforcement		
Labor	10.64 FTE	\$1,055,000
Operations		\$462,000
Maintenance & Operations		
Labor	6.9 FTE	\$507,000
Operations		\$598,000
Resource Protection and Monitoring		
Labor	0.5 FTE	\$42,000
Operations		\$70,000
Total		\$4,496,000

Interestingly, an operational budget of approximately \$4.5 million is a reduction of approximately \$1.5 million from the annual operating budget identified in the 2003 ISDRA Business Plan (Casey, 2003). Even though individual costs of management have increased with inflation, the 25 percent reduction in budget requirements reflects a reduction in emergency services, maintenance of facilities, the decline in visitation, the improvements that have occurred over the last 10 years, and the efficiencies (cost-saving measures) that have been developed through improvements in contracts and management.

It is worth noting that the above description of level of service is more a presentation of what is needed to meet the established goals and objectives for the ISDRA given the current levels of visitation, policy, and management and does not consider how management would be impacted by the described declining trend in visitation over the next five years (*Chapter 2, Section 2.3 – Recreation Use*). It is believed, this decline would not be sufficient over the 5-year life of the plan to warrant significant changes to the way the ISDRA is managed.

²² There are other costs associated with ISDRA management, such as base pay for law enforcement officers on detail who are paid for by other units of the BLM

²³ A number of assumptions are used in calculating the relationship between dollar amount and level of service. These include that all positions would be filled at the full-performance level at a mid-step (step 5) range.

3.1.1 Statutorily Required Level of Service

The discussion above focuses on what is required to meet the goals and objectives established in planning, but the question often arises as to what, by law, is the BLM required to do in the ISDRA²⁴. There is a mix of governing laws and legislation that has essentially fed the regulations that the BLM is required to follow. That in itself is a difficult concept in that ultimately these regulations are distilled in policy and guidance, which in themselves result in planning goals and objectives. As such, to a certain extent the BLM is required to work toward its stated goals and achieve its objectives in order to meet the statutory requirements.

There is obviously some flexibility provided for how, and to what level, goals and objectives are achieved, especially since the goals set for the ISDRA are rarely measurable. Therefore, the following discussion looks at a simplified selection of the guiding regulation to serve as a reference. A more thorough list of guidance is provided in Appendix B of the Draft Imperial Sand Dunes Recreation Area Recreation Area Management Plan (BLM, 2012). This is presented with the understanding that just following the laws highlighted would not meet management requirements.

The overarching legislation governing the BLM is the Federal Land Policy and Management Act of 1976 (FLPMA). This act, at its base level, requires that the BLM systematically and periodically inventory public lands for their resources and plan for present and future use of those lands. Specifically, these lands are to be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values, and where appropriate, that management will provide for outdoor recreation.

In addition to FLPMA, two other pertinent acts of legislation need to be considered for the purposes of this exercise, the Endangered Species Act of 1973 and the National Historic Preservation Act of 1966. These two acts provide the regulatory background prioritizing the protection of ecological systems i.e., habitats, species and cultural/historic resources. Further consideration to two Executive Orders also weighs heavily into the ISDRA regulatory framework. These two orders, Executive Orders 1164 and 11989, were ultimately codified in 43 CFR 8340 describing the management of OHV use. They specifically instruct the BLM to provide management to control and direct OHV use to protect resources, promote safety, and minimize conflicts.

On the ground, these statutory and regulatory requirements specifically relate to routine inventory and planning²⁵ for the ISDRA, protection of “Plank Road” (historic resource), protection of Threatened and Endangered Species i.e., the dunes closure, and the management of OHV activities to ensure public safety, reduce environmental impacts, and minimize conflicts.

This work requires elements of all the business lines described previously (*Chapter 3 - Management and Budget*). For example, the Law Enforcement business line provides many of the services needed to

²⁴ It is critically important to note that doing the regulatory minimum would not achieve the goals and objectives established in planning and would result in significant loss of visitor services and degradation of infrastructure.

²⁵ Land Use Planning is essentially complete for ISDRA for this life of this business plan.

ensure resource protection measure are upheld, promote and provide for public safety, and minimize conflicts between recreational users. Another example would be the Resource Protection and Monitoring line of business, which is closely related to the direction provided in FLPMA and the other resource protection laws and regulations. The EMS and Visitor Services line of business aids providing for, and promoting visitor safety and educating visitors on resource protection needs and measures. Like the other business lines, Maintenance and Operations are critical to providing for those statutorily required items through providing and maintaining facilities that promote resource protection provide for sustainable recreation, and aid in the delivery of visitor-safety services. Finally, all other business lines are ultimately supported by the management and administration business line, which provides the backbone from which all other business lines operate.

At its core, then, there isn't much difference between the basic level of service needed to meet the goals and objectives provided by planning -- and the level of service needed to meet the statutory and regulatory requirements. There is, however, some flexibility between these requirements and the desired level of management established in planning.

The flexibility mentioned above relates directly to the level of service provided by the maintenance and operations and visitor services business lines. For example, facilities could only receive critical -- rather than routine -- maintenance and visitor services could only be provided at the base level needed to support the other business lines (i.e., provide no SAR/EMS beyond those provided by law enforcement). As for the effect these reductions could have on operating expenditures, it's difficult to determine as a total elimination of either business line isn't realistic. However, for the purpose of this discussion if both business lines were reduced to provide only the most basic level of support for the other business lines, a maximum further reduction of expenditures of approximately \$1 million could be achieved -- but with significant consequences to the recreational experience. This amount of \$3.5 million is believed to be the minimum required to meet the most basic regulatory requirements governing ISDRA management.

As a final note, failure to meet regulatory requirements ultimately puts ISDRA OHV recreation at risk for significant limitations and potential reductions in areas available for these activities to occur.

3.2 Revenue Sources

It goes without saying that the federal government is not a "for profit" business. Maintaining sustainable recreation opportunities that meet the aforementioned project, planning, and statutory requirements requires, however, operational funds to provide services and meet other ISDRA goals and objectives. As such, an understanding of where these operational monies come from i.e., revenue sources, is critical to any business planning. The following table (*Figure 3-2*) summarizes the average contribution of each revenue source from the last three years of data and the average predicted contribution given "no action" i.e., no adjusted fees. These revenue streams are further described in the following sections below.

Figure 3-2
Average and Predicted Financial Contribution from ISDRA Revenue Sources based on “No Action”

Revenue Source	Average Contribution 2010-2012	Average Predicted Contribution / Year ²⁶
Appropriated Funding (Base)	\$1,149,000	\$1,059,000
Grant Funding	\$709,000	\$429,000
Special Area SRPs²⁷	\$2,447,000	\$1,718,000
Vendor SRPs	\$118,000	\$80,000
Total:	\$4,423,000	\$3,400,000

As can be seen in the table above, in terms of declining budgets and lower rates of visitation, the average annual revenue over the life of the business plan will essentially be \$1 million less than revenue realized in the past three years. A discussion of the implications of no action (i.e., leaving the existing fee structure and schedule in place for the next 5-years) is presented in *Chapter 3, Section 3.5 - Implications of “No Action”*.

Prior to delving into the following discussion, it should be noted that the BLM is, to a certain extent, unable to exert any control over the appropriated or grant funding – requests for increases in funding can and are frequently made, but ultimately a power outside of ISDRA and even BLM management, dictates the level of funding from these sources. As such, the recreational use fee represents the one source of funding that the BLM has the most control over. Therefore, in order to sustain management, modification of the fees must make up part of an overall management strategy, which also includes both reducing costs and seeking alternative funding sources.

3.2.1 Federally Appropriated Funding²⁸

In accordance with BLM Manual 2930 - Recreation Permits and Fees (BLM, 2006), appropriated funding i.e., that provided through a congressionally approved budget, should be the primary funding source for BLM operations relating to the provision of recreational opportunities and experiences. The ISDRA itself is not directly given an appropriation of this funding²⁹ and essentially cobbles together its appropriated budget from a number of different functional areas³⁰. As such, this appropriated funding is directed to

²⁶ This prediction is based on a continuance of current sales and sales patterns given the existing fee schedule and structure.

²⁷ Net Fee Revenue

²⁸ Dollar amounts presented in this section are derived from a combination of BLM’s current financial management system (FBMS) and its previous system (MIS) as summarized and publically shared through BLM’s grant-application process each year.

²⁹ Funds are first appropriated to the BLM and subsequently to the California State Office and ultimately the El Centro Field Office.

³⁰ A functional area is a BLM account string where funding is directed to a specific program area i.e., there are separate functional areas for Recreation, Law Enforcement, Maintenance, Wilderness, Planning, Cultural Resources, etc.

a variety of aspects of ISDRA management including, but not limited to, recreation management, facility maintenance, natural and cultural resource monitoring, planning, EMS/SAR, and law enforcement³¹.

The federally appropriated funding is split into two main categories: base funding and directed funding, both of which vary from year to year. Having said that, base funding is somewhat more stable than directed funding; as directed funding can range from zero to millions of dollars, depending on the size, scope, and specific approval of the project for which the funding is directed. Of the base funding the “Management & Administration” and “Resource Protection & Monitoring” lines previously described receive a greater percentage of their funding from this federally appropriated revenue stream than other revenue sources.

In the three-year period from 2010 to 2012 (i.e., FY10, FY11 and FY12), federally appropriated funding (both base and directed) allocated as “consumable budget” for the management of ISDRA has ranged from \$968,000 in 2010, to \$1,322,000 in 2012 – and averaged \$1,149,000³². It should be noted, that for the same period actual expenditures of federally appropriated dollars for ISDRA management ranged from \$1,512,000 to \$1,739,000; an average of \$562,000 more than allocated – this is further discussed in *Chapter 3.3 – Operating Expenditures*.

It is fact that federal budgets are in decline, and widely feared that BLM budgets as a whole will undergo reductions potentially greater than those already in place as a result of sequestration. It is unknown if these will continue to be across the board i.e., all functional areas, or will be resource-specific reductions. Either way, prudent planning would incorporate some level of reduction to these federally appropriated dollars. Some financial planning exercises propose considering budget cuts of as much as 9 percent. It is hoped this would be the “worse-case scenario” and a more realistic plan would consider a base budget reduction of 4 to 5 percent per year throughout the life of this plan; with a 5 percent reduction each year in the next two years to account for “sequestration” and 4 percent cut per year thereon-after. As such, over the life of this plan (5 years), it’s anticipated that on average base funding of \$1,059,000 will be allocated to fund operations within the ISDRA.

3.2.2 Grant Funding³³

Grant funding, is funding from outside sources (non-BLM) that is generally acquired for a specific project through a competitive application process. The principle source of grant funding for the ISDRA is the California State Off-Highway Motor Vehicle Recreation (OHMVR) grant program. The BLM applies for these grants annually and although the specifics of each grant application vary, they generally provide funding for EMS/SAR, Law Enforcement, ground operations, education, and restoration. There is no certainty in whether grant funding will be received, and if it is what amount will be received. Compounding this uncertainty, the principle source of this funding, the OHMVR grant program, has had

³¹ It should be noted that some of the management activities that occur at the ISDRA can only be paid for by specific sources of funding e.g., natural resource monitoring can only be paid for by grants or appropriated funds and not recreation fees.

³² These figures reflect the reported federally appropriated funds spent on OHV management for the EL Centro Field Office adjusted down to 90 percent to reflect that approximately 10 percent of OHV management occurs outside of ISDRA – the numbers have been rounded to the nearest whole \$1,000.

³³ Dollar amounts presented in this section are derived directly from grant agreements

its funds reallocated by the State of California, reducing the overall amount available for grant applicants.

In the past five years, the total annual grant funding received for the ISDRA has ranged from \$200,000 to more than \$1.1 million; the average for the 5-year period was \$572,000, but for the last three years just \$487,000. Typically, each year BLM applies for four ISDRA project-specific grant requests i.e., law enforcement, EMS, visitor services, and maintenance and operations. The largest project-specific ISDRA grant received was \$499,000 for law enforcement in 2009. To assume no grant funding for the ISDRA in any year over the life of the business plan would be unrealistic, although this did happen in 2008. This coming year (Financial Year 2014) will, however, most likely be a reduced grant year due to a smaller pot of grant funding available from the State of California. To therefore plan on continuing to receive either the 5-year or 3-year average would also be unrealistic. As such, the five-year average received for just law enforcement which has historically been the most stable and reliable grant award (based on how the State of California categorizes, divides and distributes the available grant funds) will be used for planning purposes. This is an amount equal to approximately \$429,000.

Although historically the State of California OHMVR Division has been the principle source of grant funding the BLM is committed to seeking out other grant opportunities from both other government entities (including the Federal Highway Administration) and the private sector. These opportunities often require the assistance of partners including Imperial County and user groups. Thus far the BLM has achieved a few successes in this area, including grant funding from private organizations for informational and interpretive signs place at key locations within the ISDRA.

3.2.3 Fee Revenue³⁴

As previously stated, some form of recreational-use fee has been in place for the ISDRA for more than 10 years. Over that time, revenue from the fee program has constituted the majority of funds used for operations. Fee revenue itself is a factor of three things: the amount of the individual fee, the level of visitation, and the rate of compliance. A drop in any of these three items results in a decrease in fee revenue. The fee revenue collected has supported all business lines to some degree, however, the greatest expenditure has been to Law Enforcement, EMS, Visitor Services, and Maintenance and Operations – the latter being the business line that has operated below optimum levels when fee revenue or other funding has declined.

Prior to delving into a detailed discussion of fee revenue, it's worth noting that the previously mentioned ISDRA Visitor Survey (University of Idaho, 2011) asked specific questions about the current fee structure and schedule. The results of which showed that 63 percent of those surveyed felt the fee charged was about right, while 25 percent felt the fee was too high. Interestingly, 82 percent were satisfied with the overall facilities, services, and opportunities provided by the ISDRA.

The following discussion references the current fee structure (i.e., how the fee is charged) as established by the Imperial Sand Dunes Recreation Business Plan (Casey, 2003). Although, the fee schedule (i.e., the amount of the fee charge) currently in place differs from this business plan, which recommended a fee

³⁴ Dollar amounts presented in this section are derived from the publically distributed annual fee reports

schedule of \$30 per non-holiday weekend, \$60 per holiday weekend and a \$180 annual permit for all weekends (Casey, 2003). It's worth noting here that during a visitor survey 40 percent of respondents reported that had the fee been implemented as described above they would have changed the weekends they visited the ISDRA to the cheaper weekends (Haas, 2008).

The current fee structure has three main components;

- 1) **Special Area SRPs:** these are individual SRPs levied on a per-primary-vehicle³⁵ basis and charged either weekly at \$25 with an off-site purchase or \$40 with an on-site purchase, or seasonally at \$90 for an off-site purchase or \$120 for an on-site purchase. Historically, these fees have been collected by a contracted organization. As such, fee revenue is considered to be the gross collected minus the cost of collection. The cost of collection reflects two items: the commission afforded Authorized Permit Vendors³⁶ (currently 10 percent of each permit sold); and the fees associated with processing payments e.g., credit card fees, which can range from a little more than 1 percent to more than 3 percent of the transaction amount, depending on the credit card use and the processing company.

The BLM currently uses a contractor to administer the implementation of these fees, which provides printing, Authorized Permit Vendor administration and collections management, including collections staff. In essence, this contract is a cost of collection, but unlike the processing fees and commissions does not directly reduce fee revenues received by the BLM, but is instead paid from funds already held by the BLM³⁷. As such, this cost of collection is considered in the Administration & Management business line, rather than as a reduction on fee revenues received. For reference, the average cost of this contract over the last three-years has been \$896,000.

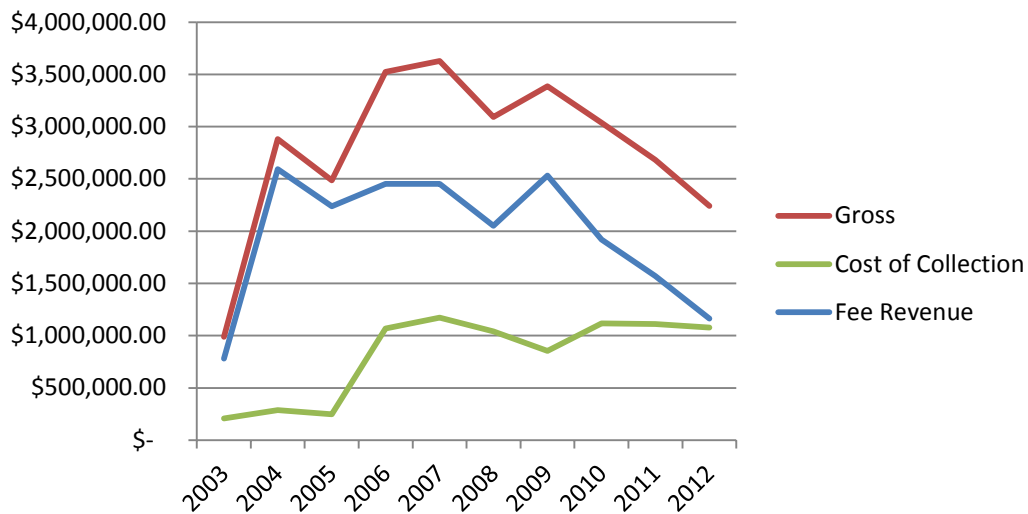
The following figure (*Figure 3-3*) summarizes the last 10 years of fee revenue generated from Special Area SRPs, which result in an average gross fee revenue of \$2,794,000, with an average cost of collection at \$550,000 or approximately 20 percent of gross, for a final average net revenue of \$2,244,000.

³⁵ A primary transportation vehicle is a street-legal vehicle used for transportation to the recreation site. A street-legal vehicle that was towed to the site and whose sole purpose is to be driven off-road for recreation is not considered a primary transportation vehicle (Federal Register / Vol. 63, No. 242 / Thursday, December 17, 1998 / Notices).

³⁶ Authorized Permit Vendors are those businesses that have asked to be able to sell ISDRA Recreation Permits on the behalf of the BLM. These businesses include a wide variety of local and regional operations ranging from grocery stores to casinos. In return for selling ISDRA permits, the vendor receives a commission for each sale and the ability to market the availability of ISDRA permits at its venue. These vendors provide a valuable service by increasing sales efficiency, reducing permit-purchasing traffic within the ISDRA, and generally increasing the level of customer service associated with the ISDRA experience.

³⁷ Basically, the contractor collects the fees minus the credit card processing and Authorized Permit Vendor commissions and transfers these funds into the BLM account, who then at a later date pays the contractor for its services.

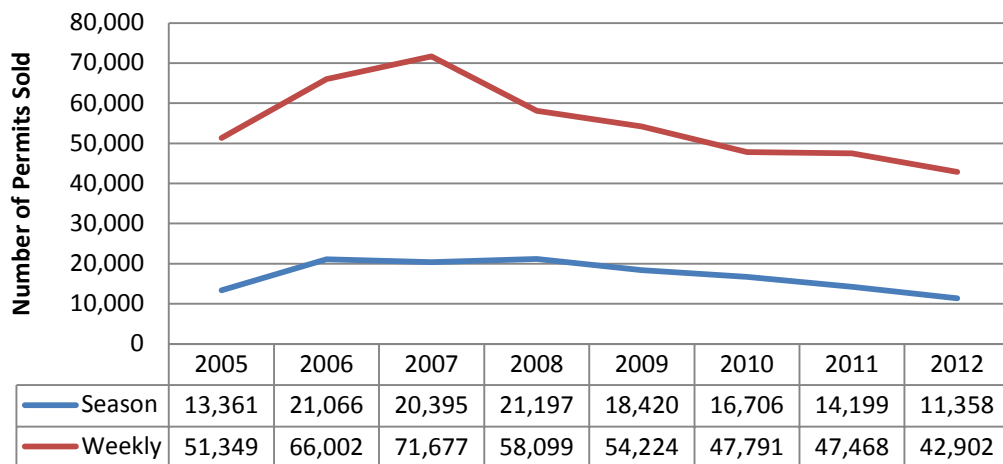
Figure 3-3
Fee Revenue from Special Area SRPs 2003 – 2012



The last three-years are particularly telling of the trend in fee revenue. It can clearly be seen that the costs of collection have stabilized (directly as a result of the current fee contract), while revenues have begun to decline. Looking only at the last three years of data, the average fee revenue has been \$2,447,000.

Besides considering the overall gross/net revenue generated from these Special Area SRPs, it's worth examining a breakdown of the number of permits sold to establish a trend on which financial analysis can be performed. The following figure (Figure 3-4) shows the number of permits sold by type i.e., weekly or seasonal.

Figure 3-4
Number of Permits Sold (2005 – 2012)



As with direct revenues and visitation, the number of units sold peaked in 2007 and has been in decline since: a decline of approximately 8 percent per year³⁸. (Season permit sales have declined by an average of 10 percent per year, whilst weekly permits have only declined by an average of 7 percent per year.) On average, for the period from 2005 to 2012, 17,088 seasonal permits and 54,939 weekly permits (a total of 72,027 permits) were sold annually. For this same period an average of 24 percent of all permits sold were season permits.

Complicating the revenue from fees is the on-site/off-site differential in fee price,, the commissions afforded vendors, and the transaction fees described earlier. The BLM has tracked where sales occurred since 2007 with a finding that currently (2012), approximately 16 percent of total sales occurred on-site. Interesting to note that this is a 180-degree shift from the first year off-site permits were sold (2007), when just 14 percent were sold off-site. It is believed that the level of off-site sales has stabilized and as such, the current year's sales patterns will be used throughout this business plan to establish predicted fee revenue per year over the life of the business plan.

Predicting what, as a result of the trends identified above, permit sales, and therefore revenue, will look like over the next five years is instrumental in identifying if there is a need to adjust the fee structure and/or schedule, and if so, how?

Using the unit sales data from FY12 as the baseline we can predict based, on the identified trends i.e., a decrease in weekly permit sales of 7 percent and in season permit sales of 10 percent, what unit sales will look like should nothing change. The following table (*Figure 3-5*) presents these figures and the average for the next five years.

Figure 3-5
Estimated Permit Sales 2014 - 2018

Financial Year	Estimated Weekly Permit Sales	Estimated Season Permit Sales	Total Permit Sales
2014	42,902	11,358	60,964
2015	39,899	10,222	56,087
2016	37,106	9,200	51,600
2017	34,509	8,280	47,472
2018	32,093	7,452	43,674
Annual Average:	37,302	9,302	51,959

The sales patterns themselves i.e., where people purchase their permits, impact the actual revenue received by the BLM. The following assumptions, based principally on FY12 and FY13

³⁸ Worth noting that visitation only has a declining trend of 2 percent per year, yet fee revenue has a declining trend of 9 percent per year. This fact may again support the assertion that a single season permit may be being shared amongst several different visitors during the course of the season – thus reducing the overall unit sales of permits.

sales data, is be used to equate the above estimated permit sales (*Figure 3-5*) to predicted revenues given no change in fee structure or schedule;

- 90 percent of season permits sold will be purchased off-site for \$90; thus the remaining 10 percent will be purchased on-site grossing \$120 each.
- 23 percent of weekly permits will be purchased on-site for \$40; the remaining 77 percent will be purchased off-site at \$25 each.
- 3 percent of weekly permits and 11 percent of season sold off-site will be sold directly by the BLM or its contractor.
- 47 percent of weekly permits and 50 percent of season permits sold on-site will be sold directly by the BLM or its contractor.

Taking only the annual average from Figure 3-5 above and applying the aforementioned assumptions gives the following breakdown of revenues³⁹;

- On-site weekly permits: \$343,000;
- Off-site weekly permits: \$718,000;
- On-site seasonal permits: \$112,000;
- Off-site seasonal permits: \$753,000.

Thus, the average gross fee revenue for the five-year life of the business plan is projected to be \$1,926,000. Factoring in the 10% commission paid to Authorized Permit Vendors for those permits not sold by the BLM or its contractor, the average annual revenue would be \$1,718,000.

- 2) **Vendor SRPs**⁴⁰: these are Commercial SRPs issued to individuals and businesses wishing to sell products and services on public lands within the ISDRA⁴¹. These fees are charged based on vending days and range from \$25-per-day for midweek to \$30-per-day for weekends; they increase to \$60-per-day during holiday periods. A calendar showing rates for the year is published annually. For reference, any vendor wishing to vend every possible day of the season for the 2011 season would have paid \$8,145 – this amount varies slightly each year based on when the holiday falls within any given week. In the same period, the average individual/business⁴² paid \$1,600, the average long-term vendor paid \$4,760, the average mobile vendor paid \$2,700, and the average short-term vendor paid \$1,160.

These fees are paid directly to the BLM with 100 percent of the fee collected remaining in the El Centro Field Office. The following figure (*Figure 3-6*) summarizes the last 10 years of revenue from Vendor SRPs;

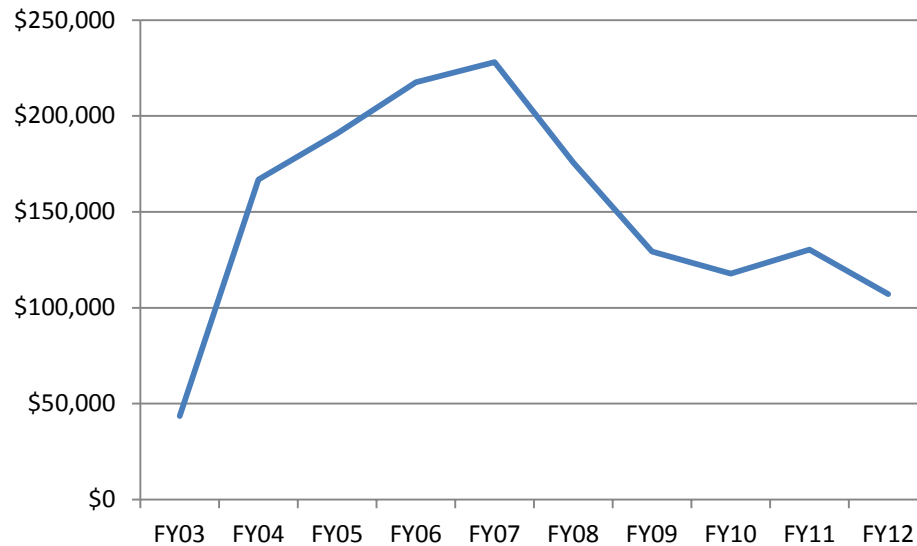
³⁹ Figures have been rounded to the near \$1,000.

⁴⁰ These figures are generated from BLM's CBS (Central Billing System) deposits.

⁴¹ Types of vending in the ISDRA are categorized into Long Term, Short Term, and Mobile Vending. These are described in Chapter 2, Section 2.5 – Vending.

⁴² Individual or business may have held several separate permits.

Figure 3-6
Fee Revenue from Vendor SRPs 2003 – 2012



For the past 10 years, the average revenue has been approximately \$151,000. However, as with other revenue streams, this number has been in decline over the past five years, at a rate of about 13 percent per year. Given this declining trend, the average revenue over the life of the business plan would be approximately \$80,000.

- 3) **Other SRPs:** these are commercial (non-vending e.g., outfitters and guides), competitive and organized group SRPs for events, and activities occurring within the ISDRA. These permits generally contribute a less than significant amount to overall fee revenue, between \$0 and \$5,000 annually. The fees charged for these activities reflect the standard SRP fees established by the BLM Director. Since the fees generated by these SRPs are less than significant and issuance of these permits varies based on demand for these commercial, competitive, and organized group activities, they are not considered part of the fee revenue stream and not discussed any further in this document.

Compliance is the final factor impacting fee revenues. Throughout this document, the level of compliance itself is not considered important in describing the result of adjusted fees, as these calculations are based on current patterns and trends in permit purchases. Obviously, compliance becomes more critical in ensuring that those who previously purchased permits (including vendors) continue to abide by the rules and purchase those permits at the adjusted prices. For the purposes of discussion on the current situation, however, the compliance rate is believed to be at or around 90 percent. This figure is achieved through random checks on a specific number of vehicles each weekend. A compliance rate this high is a major achievement. There are, however, known limitations with the current fee structure that result in permits being shared – especially season permits. Ultimately this means that the season permit itself might be a frequent visitor to the dunes, even if the individual who purchased the permit is not.

The above assertion is further supported by looking at the specific rate of compliance for season permits. Approximately 50 percent of all vehicles checked are found to hold a season permit. Yet season permits only account for about 24 percent of all permits sold. Therefore, it could be expected that on any given weekend the majority of vehicles checked should hold weekly permits⁴³.

Furthermore, going back to the statements made in *Chapter 2, Section 2.3 – Recreation Use*, there is an obvious discrepancy between vehicle counts and permits sold that cannot be completely explained by those vehicles not required to purchase permits and overestimates in visitation. The remaining explanation further supports the above assertion in that although many vehicles appear in compliance, the number of permits sold does not relate. Ultimately that means that although permit checks report a 90 percent rate of compliance, the compliance in the number of primary vehicles purchasing permits may be more like 60 percent⁴⁴.

3.2.4 Partners & Volunteers

The BLM partners in some form or another with a variety of entities, from local government in the provision of law enforcement and EMS/SAR services, to non-profit and volunteer groups that engage in various works from visitor studies to dune clean-ups. Although these partners provide valuable services, including aiding in fee compliance, education and interpretation, public outreach, and maintenance, none contribute significantly as a revenue source. But they all do provide, however, some level of service that reduces the overall management costs of the ISDRA.

3.3 Operating Expenditures

Thus far, the level of service required to meet the various goals and objectives set out for the ISDRA and the major revenue streams contributing to the consumable budget available for ISDRA management have been presented. As previously stated, however, actual past expenditures have not always achieved this level of service or remained within the available consumable budget. It should be noted though, that project-specific directed funding has occasionally allowed for higher expenditures and therefore higher levels of service and improvements above and beyond basic standards.

The revenue sources for the expenditures displayed in the following figure (*Figure 3-7*) are explained above in detail (*Chapter 3, Section 3.2 – Revenue Sources*).

⁴³ It is plausible that season permit holders visit so frequently and weekly permit holders all arrive on the same few weekends that this average could be achieved

⁴⁴ This number is calculated by dividing the average number of vehicles crossing the vehicle counter, by a repeat crossing rate of 3 (a number derived from anecdotal observations of traffic) and then taking this number as a percentage of permits actually sold.

Figure 3-7
Expenditures by Major Revenue Stream (2008 – 2012)

Year	Fee Expenditures	Federal Expenditures⁴⁵	Grant Expenditures⁴⁶	Total Expenditures
2008	\$3,468,900	\$258,700	\$1,174,200	\$4,901,800
2009	\$2,313,400	\$972,000	\$225,400	\$3,510,800
2010	\$2,836,700	\$1,511,900	\$434,400	\$4,783,000
2011	\$2,986,000	\$1,883,000	\$509,400	\$5,378,400
2012	\$2,556,000	\$1,739,000	\$518,000	\$4,813,000

Although looking at the expenditures above (averaging \$4.7 million), it appears that the ISDRA has operated at, or above, the level described in *Chapter 3, Section 3.1 – Levels of Service*. This has only been achieved through overspending the consumable budget to the detriment of other programs and areas. This issue, as previously mentioned (*Chapter 3, Section 3.2 – Revenue Sources*) is the difference between federal expenditures and the amount of the federally appropriated “consumable budget” for the ISDRA. The following table (*Figure 3-8*) shows the federally appropriated consumable budget for the ISDRA for the FY2010 through FY2012 as above (*Figure 3-7*).

Figure 3-8
Federal Budget and Expenditures for the ISDRA 2010 – 2012

Financial Year	Consumable ISDRA Budget	Actual ISDRA Expenditures	Amount Over Spent
2010	\$968,485.74	\$1,511,923.50	-\$543,437.76
2011	\$1,156,779.00	\$1,883,083.16	-\$726,304.16
2012	\$1,322,462.61	\$1,738,997.34	-\$416,534.73
Totals:	\$3,447,727.35	\$5,134,004.00	-\$1,686,276.65
Annual Average:	\$1,149,242.45	\$1,711,334.67	-\$562,092.22

As can be seen in the table above (*Figure 3-8*), over the last three-years the ISDRA has overspent its consumable budget by an average of \$562,000. Operating the ISDRA with this level of overspend – although not a true deficit – is possible as allocated funds from other programs within the El Centro Field Office’s overall consumable budget have been spent to support ISDRA work. This ultimately means that work outside of the ISDRA is not being achieved at desired levels. This situation is obviously not desirable nor sustainable – thus requiring action as proposed in this document.

⁴⁵ This number is derived from the amount reported to be expended on OHV management in OHMVR Grant Applications, reduced by 10 percent to reflect the portion of OHV management in the El Centro Field Office that does not occur within the ISDRA.

⁴⁶ This number is derived from actual grant expenditures either directly related to ISDRA management, or for those grants e.g., law enforcement, that provide for the entire field office, reduced by 10 percent to reflect that the majority is still expended on ISDRA management.

3.4 Cost-Saving Measures

Thus far, the cost to operate the ISDRA in order to meet the goals and objectives established for the area has been explained and the revenue sources that fund these costs detailed. It is evident that looking at the operating expenditures (*Chapter 3, Section 3.3 – Operating Expenditures*) and comparing them to the needed levels of service (*Chapter 3, Section 3.1 – Levels of Service*) that the ISDRA either overspends each year, or the level of service provided is not sufficient to meet the established goals and objectives. In reality, it's a bit of both. Over the years, the BLM has sought efficiencies in management and contracting to save money. These cost-saving measures range from completing work in-house e.g., no contracts for environmental planning or toilet cleaning services – to building on and seeking out new partnerships in order to bring additional services to the ISDRA. Some of the most notable cost-saving measures include:

- Improvements to signage from sign sponsors that incidentally reduced the need to continually replace signs as a result of vandalism;
- A reduction in a trash collection contract cost from approximately \$400,000 to \$200,000;
- In-house cleaning of vault toilets – eliminating a \$100,000 contract;
- A long-standing partnership with Imperial County to provide assistance with law enforcement efforts in the ISDRA;
- A partnership with US Border Patrol to provide additional SAR/EMS and enforcement during high visitation periods – thus reducing reliance on BLM enforcement officers and lowering overall operational costs of the enforcement program;
- Various partnerships with local hospitals and emergency transport services to provide additional EMS/SAR capabilities;
- Reduced law enforcement staffing for holiday weekends by 70 percent from historic average to the minimum levels required by BLM policy;
- Increased efficiency in EMS staffing for holiday weekends by reducing the number of staff and increasing the number of hours each staff person works – reducing costs of this business line on these weekends by 26 percent; and
- Use of volunteers for a wide variety of tasks, from dune clean-ups to routine visitor services.

3.5 Implications of “No Action”

As is alluded to above (*Section 3.3 - Revenue Streams*), given the declines in federal budgets i.e., base funding, uncertainties in the grant program, and a falling trend in fee revenue, the anticipated funds available for operating the ISDRA is, given no change, expected to be an average of around \$1 million less than in previous years. Coupled with the overspent funds, from the consumable federal budget there is a need to review and adjust fee revenues to maintain the basic levels of service as described in *Chapter 3, Section 3.1 - Levels of Service*, and avoid increasing the amount overspent and avoid operating in deficit.

The basic level of service required to meet the intent of management i.e., those goals and objectives established to achieve policy and regulatory direction requires an estimated operating budget of \$4.5

million per year. Given the annual anticipated consumable budget (*Figure 3-2*), there is a gap of \$1.5 million (33 percent). Taking this scenario even further and looking back to *Chapter 3, Section 3.3.1 – Statutorily Required Level of Service*, the anticipated average available still falls short of meeting these requirements (by approximately \$100,000), which puts OHV-recreation opportunities at significant risk.

Understanding what a gap in funding of essentially \$1.5 million means to ISDRA management requires looking back at the Level of Service table presented previously (*Figure 3-1*). It's difficult to say what business lines would be cut, or what percentage would be cut from each, but for purposes of this document, the following table (*Figure 3-9*) identifies the impact of a unilateral 33 percent cut in budget across all business lines.

Figure 3-9
Level of Service Resulting from 33% Cut in Budget

Level of Service Resulting from 33 % Cut in Budget				
Business Line	Required Budget	Required Level of Service	Budget (Reduced by 33%)	Resulting Level of Service ⁴⁷
Administration & Management				
Labor	\$235,000	2.05 FTE	\$155,000	1.4 FTE
Operations	\$815,000		\$538,000	
EMS & Visitor Services				
Labor	\$568,000	6.85 FTE	\$375,000	4.5 FTE
Operations	\$144,000		\$95,000	
Law Enforcement				
Labor	\$1,055,000	10.64 FTE	\$696,300	7.0 FTE
Operations	\$462,000		\$305,000	
Maintenance & Operations				
Labor	\$507,000	6.9 FTE	\$335,000	4.5 FTE
Operations	\$598,000		\$395,000	
Resource Protection and Monitoring				
Labor	\$42,000	0.5 FTE	\$28,000	0.3 FTE
Operations	\$70,000		\$46,000	

Understanding what this kind of reduction means is difficult based on the numbers alone. As such, the following describes what management might look like under these circumstances⁴⁸;

Administration & Management: With just over 2,800 hours of dedicated management, a single person may not be assigned to oversee ISDRA management. If it were a single person, that person could be responsible for overall program administration, grant applications, contractor oversight, fee management, vendor management, planning, external affairs, and employee

⁴⁷ Level of Service is described here as in *Chapter 3, Section 3.1 – Level of Service*, using Full Time Equivalents (FTE) as defined previously.

⁴⁸ It should be noted, that a unilateral cut like this isn't a realistic option for management as some services are ultimately required to address any legal mandates imposed by the courts to keep the area open to OHV recreation. As previously stated, the assumption is that the Management and Administration business line would need to be preserved at a higher level, as would the Law Enforcement and Resource Protection and Monitoring lines of business, rather than the EMS and Visitor Services, as well as Maintenance and Operations business lines.

supervision. Given the need to preserve revenue streams, fee-collection contracting, grants, and vendor management could become priorities. Thus, major reductions in external affairs, planning, customer satisfaction, and contract oversight could occur. In addition, the ISDRA may not equate to a day's work per week for the El Centro Field Manager, reducing attention to ISDRA management issues, the public, and internal coordination for the area. Management's focus could switch from partnerships and innovation to just handling top priorities. The reduction in overall operations could reduce the support ISDRA receives throughout the agency and limit the work done to inventory, preserve and protect the recreational, natural and cultural resources of the area, and hamper the ability to continue to maintain sustainable OHV-recreation opportunities.

EMS and Visitor Services: Most notably there may not be additional support for holiday weekends, a routine staffing of four people in season (including a supervisor), and three off-season, may need to handle all visitor services work. The level of interpretation and visitor assistance could fall, while response times could increase. The reduction in OHV equipment could equate to just two service vehicles and one rescue buggy being operable at any one time. The ranger stations themselves could be closed while staff responded to medicals. That, coupled with longer response times, could result in a noticeable reduction in customer service – potentially endangering lives. In addition, a reduction in medical supplies could limit the services provided to only those the staff had the supplies to offer. Besides direct impacts to visitors and the level of customer service, Imperial County could be impacted by an increased reliance in its SAR, EMS, and law enforcement services through increased ISDRA-related service calls.

Law Enforcement: A routine level of law enforcement could be largely maintained, with a minor reduction in hours of service dedicated to the ISDRA throughout the season (an even more limited service would ensue during off-season). There could be no additional aid during holiday weekends –increasing risk to public and employee safety. An overall reduction in serviceable OHV-type equipment could occur; however, primary law enforcement vehicles for the routine staff would be maintained. In the absence of other ISDRA staff, law enforcement could increasingly be relied upon to respond to EMS and SAR service calls, thus further reducing time spent on primary duties.

Maintenance and Operations: Basic maintenance consumes nearly the entire operations budget. Toilet pumping service could cease or be reduced though a closure of some or all of the vault toilets. Savings from toilet closures could be directed to heavy equipment costs, which would allow the reduced staff the opportunity to perform critical road maintenance. Camping pad grooming, shoulder work, and sand sweeping may not routinely occur, thereby decreasing available camping areas and reducing the ease of access to the ISDRA. Maintenance of buildings and other assets could be placed in low priority and only critical items dealt with. Aesthetically, this may lead to unsightly, unmaintained facilities – thus also diminishing the visitor experience and creating unsafe and unsanitary environment for ISDRA visitors.

Resource Protection and Monitoring: In years when required monitoring is minimal, resource protection and monitoring could be achieved. If monitoring in excess of one month is required, OHV recreation opportunities could be impacted through closures until monitoring could be achieved. In addition, failure to routinely sign and enforce the closure may result in legal action, potentially resulting in negative impacts to OHV recreation.

Mostly likely, a 33 percent reduction in operational funds would not be unilaterally allocated across all business lines. Deciding what services to maintain and what to cut is ultimately a management decision that prioritizes goals and objectives for the ISDRA and the relative risks to employee and public health and safety, as well as the risk of litigation.

Chapter 4: Fee Proposal

The following presents the fee adjustment proposal for the ISDRA. As described in *Section 1.2 - Process*, this proposal will be presented to the Recreation Resource Advisory Council (R/RAC) and based on its recommendation will either be carried forward, modified, or abandoned. The final fee structure will be published on site, online, and in local media prior to the start of the 2014 season (additional information on public outreach can be found in *Chapter 5: Public Participation* and in the separately published ISDRA BP Communication Plan (BLM, 2012)).

It should be noted that a number of different proposals for fee structure and schedule were examined during the preparation of this business plan. These proposals and a rationale for not selecting them included in *Alternatives Considered but Eliminated* under each fee type (*Sections 4.1.3 and 4.2.3*). A brief discussion of other concepts gathered in a “brainstorming” session during the scoping meetings can be found in *Appendix B – Fee Structure and Schedule Concepts*.

4.1 Visitor Fees

Visitor fees continue to provide an important revenue stream for the management and maintenance of opportunities and experiences provided within the ISDRA. It is deemed appropriate (BLM H2930-1 Chapter 1 Section II Fees A.1) that those visitors specifically benefiting from these opportunities contribute above and beyond that of a non-benefiting member of the public (i.e., a tax-payer and/or California OHV registrant who does not use the ISDRA).

4.1.1 Proposed Fees

The Special Area Individual SRP would continue to be levied on primary vehicles i.e., those street-legal vehicles primarily used for transportation to the ISDRA. Permits would be required between October 1st and April 15th annually. Permit-free days would be consistent with those authorized by the President, the Secretary of the Interior, the BLM Director, California State Director, and the El Centro Authorized Officer. No permit would be needed for short-term visitation at Osborne Overlook, the Plank Road Cultural Resource Site, the Buttercup Ranger Station⁴⁹, or the Watchable Wildlife Area.

The adjusted 2014 fee for the Special Area Individual SRP would be **\$35 per seven-day period (week)**⁵⁰ when purchased off-site and **\$50 per week** when purchased on-site. In addition, a seasonal permit⁵¹ would be available at off-site sales locations for **\$150 per primary vehicle**.

The differential between on-site and off-site sales is an incentive for visitors to purchase permits prior to arrival in the ISDRA. This allows for increased customer service (i.e., wider availability of permits) and

⁴⁹ Short-term visitation areas would be signed.

⁵⁰ For the purposes of ISDRA, a week is generally a seven-day period running from the date of purchase or the date selected by the permittee, but may be extended by a few days to accommodate holiday weekends.

⁵¹ It is anticipated the season permit will be a sticker affixed to either the bumper or windshield of the primary vehicle.

reduces the dependency on BLM staff or contractors on-site. In addition, off-site permit sales reduce traffic build-up at key ISDRA access points caused by visitors purchasing permits.

The BLM would use one official online (website) sales outlet for its off-site sales and continue to provide opportunities for on-site sales at the BLM ranger stations, and if needs dictate, throughout the ISDRA with a “roving sales outlet.” In addition, the BLM would offer off-site, on-site, and seasonal permits wholesale to Authorized Permit Vendors⁵². The wholesale price would be \$2 less than the BLM’s retail price i.e., \$33 off-site and \$48 onsite, for weekly permits and \$7 less than retail i.e., \$143, for seasonal permits – permit vendors could charge whatever price they felt appropriate recognizing the BLM retail price was \$35 off-site and \$50 on-site for weekly permits, and \$150 for a seasonal permit. The Authorized Permit Vendor program for both on-site and off-site vendors would be facilitated through both Cash on Delivery⁵³ and Consignment⁵⁴.

Knowing that a number of visitors bring multiple primary vehicles, BLM’s official off-site sales venue: the website, would afford a discount of \$10 on a second weekly permit purchased at the same time⁵⁵. One discounted permit could be purchased for every full-priced permit sold in the same transaction e.g., a visitor purchasing two weekly permits through the website would pay a total of \$60 (one permit for \$35 and one for \$25), or a visitor purchasing 10 weekly permits through the website would pay a total of \$300 (five permits for \$35 and five for \$25). The weekly permits purchased could be purchased for the same period of time, or different weekly periods throughout the season.

In order to keep permit prices in line with inflation and avoid sharp price increases in the future, the weekly permit prices would increase by \$5 half-way through the life of this business plan in 2016; In addition season permits would increase by \$15 in the same year. It should be noted, the BLM reserves the ability to not impose these increases should it become evident that anticipated federal, grant or other funding sources are stabilizing or returning to historic levels. The resulting price structure is as follows (*Figure 4-1*):

Figure 4-1
Special Area Individual SRP Fee Increase Schedule

	2014	2015	2016	2017	2018
Off Site	\$35	\$35	\$40	\$40	\$40
On Site	\$50	\$50	\$55	\$55	\$55
Season	\$150	\$150	\$165	\$165	\$165

The BLM reserves the ability not to implement fee increases should changes in technology or drops in visitation and levels of service dictate that no price increase is needed.

⁵² Authorized Permit Vendors would request from BLM the ability to sell permits. Approval to vend permits would be based on a number of items, including location, community served, operations, and past performance.

⁵³ An Authorized Permit Vendor buyback program would be conducted between April 15th and May 31st each year, and would buyback unsold permits at the wholesale price. Permits not returned during this time would not be refunded.

⁵⁴ Not all vendors would qualify for consignment sales. Ability to sell by consignment would be based on credit and performance. Unsold permits issued through consignment would have to be returned by April 30th each year. If not, the permit vendor would be charged the wholesale price for outstanding permits.

⁵⁵ This type of discount maybe referred to as a “BOGO \$10 Off” (Buy One, Get One \$10 Off).

Of final note, there is no proposed change as to how “towed-in” vehicles – whose use is only for cross country travel within the ISDRA – would be managed. Once street-legal towed-in vehicles leave the sand on their own power, they will continue to be required to hold a separate permit. Authority

As previously discussed (*Chapter 1.1 – Authority*), the BLM has the authority to collect fees for recreational use based on the FLREA. The specific authority for this fee structure stems from the BLM Director’s ability to establish a permit fee in connection with the issuance of a permit provided for in 43 CFR [2932.31(a)] and the State Director’s ability to adjust these fees (43 CFR [2932.31(d)]) as necessary. Furthermore, the BLM Manual 2930 and Handbook H2930-1 provide the policy direction for establishing/continuing to use, Special Area Individual SRPs for OHV recreation as the method of collection within the ISDRA (H-2930-1 Chapter 1, I.D).

The supplemental rule to require fees in the ISDRA was established by the California State Director through a supplementary rule posted in the Federal Register (Federal Register Vol. 63, No. 242 [December 17, 1998]).

4.1.2 Alternatives Considered but Eliminated

The 2012 Draft Business Plan (BLM, 2012) considered four alternative fee schedules: the “No Action,” which continued the current fee structures of \$25 weekly permits and \$90 season permits off-site and \$40 weekly permits and \$120 seasonal permits onsite, and three action alternatives that all eliminated on-site season permit sales, charging between \$100 and \$250 for season permits off-site and had weekly permit costs ranging from \$35 off-site at its cheapest to \$100 on-site at its most expensive. The proposed alternative in the 2012 Draft Business Plan set prices at \$180 for a season permit and \$40 for a weekly permit off-site and \$70 for a weekly permit onsite. These alternatives were eliminated based upon internal review of the document and public comment. The proposed fee is actually a modification of Alternative 3 from the 2012 Draft with a modified fee schedule.

An alternative that mimicked the proposed fee, but eliminated a season permit was considered. This idea, however, was eliminated due to public request and support for continuing the availability of a season permit. The rationale for consideration of this alternative was that the abolishment of seasonal permits would lower administrative costs and close a loophole whereby the current season-permit system is open to abuse in that permits may be shared amongst different users for different weekends⁵⁶.

Another alternative fee schedule that mimicked the proposed fee, but included a \$3 increase per year was considered. This idea was principally considered to resolve a deficit that results from the predicted general decline in all revenue sources. With this annual increase of \$3, fee revenues would theoretically offset anticipated declines in appropriated dollars. The idea was not carried forward due to the uncertainty in budgets five years from now, and the lack of initial need for this increase. Instead the flat \$5 increase half way through the plan – with the option of not implementing such an increase should it not be necessary – was added to the proposed fee schedule.

⁵⁶ Anecdotal evidence of such sharing exists on ISDRA-related blogs, forums, and from information received from individuals.

The success of this fee proposal depends on revenue received in the first few years above and beyond prescribed expenditures being retained and carried-over to future years. An alternative-fee proposal was considered that followed the same structure as the proposed fee adjustment i.e., elimination of season permits and weekly permits being available on- and off-site, but was stepped with an initial \$5 increase, followed by another \$2.50 increase in the second year, a \$5 increase in the third year, another \$5 increase in the fifth year and a \$10 increase in the seventh year. This fee schedule results in only enough fee revenue to bring the anticipated revenue sources to equal the anticipated \$5 million in expenditures for each year. The alternative was not carried forward as it implemented several larger fee increases and is more complex in implementation and fee education than a regular and routine increase as proposed.

The idea of switching from a Special Area Individual SRP to an expanded amenity fee was considered. However, this was eliminated based on the fact that the type of fee would not influence the fee schedule i.e., fee prices would remain the same. As a result of BLM policy, both the Special Area SRP and the expended amenity fee are required to undergo the same processes – thus there is no difference between the two.

The concept of changing the fee structure from “primary vehicles” to a “per person” or “per OHV” was given consideration. This proposal essentially would involve a reduced-fee charged to more people. This type of fee structure would benefit individuals, but most likely end up costing groups more than the proposed fee. This concept was eliminated as compliance and enforcement of such a system would require additional staff to monitor people and/or OHVs and ultimately increase costs.

The idea of using license plate recognition technology at key entrance points to automatically document and charge primary vehicles entering the ISDRA was given consideration. This concept would be similar to Congestion Charge Zones implemented in various cities around the world. These systems use cameras at all entrance points to document when a vehicle enters and leaves a specific zone. The system allows for pre-payment or post-payment at differing rates and includes options for seasonal permits. In places where these systems have been implemented, the technology is automated using the internet and e-mail to notify users and receive payments. Regular mail is also used as needed. The concept has some merit in that it would greatly reduce administration costs, as technology would be chiefly responsible for compliance monitoring and billing, etc. and is worth further investigation. The idea was eliminated as it’s believed it would take longer than the time available to contract out and setup. In addition, start-up costs may be prohibitively high, but this idea may warrant further investigation.

4.2 Vendor Fees

Vending serves two main purposes in the ISDRA. First, vending provides services and goods that would otherwise only be accessible from a couple of merchants located on private property within the ISDRA, or from the nearest communities more than 20 miles away. Second, it provides services that enhance or aid in the management of the area. Both purposes ultimately aid in attaining the desired visitor

experience. As such, it continues to be appropriate under these new fee proposals to authorize individuals and businesses to sell goods and provide services on public lands within the ISDRA.

Vendor fees would continue to be implemented through the Commercial SRP system for vending. Due to the complexity of the vending permit issue, the need to collect additional data to make a reasoned decision, and a substantially different approval and public process, the proposal in the Draft 2012 Business Plan (BLM, 2012) to adjust these fees simultaneously with visitor fees has been abandoned.

4.3 Financial Analysis

The financial analysis serves to explain the predicted ISDRA revenue stream from recreation fees based on this fee proposal (*Chapter 4 - 4.1 Visitor Fees*). This financial analysis will use the information provided for unit sales, numbers of permits, sales location, etc. and the predicted averages established for the life of the plan presented throughout this document (*Chapter 3 - 3.2.3 Fee Revenue*).

4.3.1 Visitor Fees

Predicting the revenue stream from the proposed visitor fees hinges on the base assumption that the trends seen over the last three to five years, in terms of visitation, budget levels, compliance, etc. will continue for the life of the plan. Although in some cases these trends seem dire, there is currently no basis on which to predict a change in these trends. Should the current trends accelerate, this financial analysis would therefore reflect higher revenues than actually received. Should trends reverse; the analysis will reflect lower revenue than actually received. This analysis will also assume the following based on patterns and trends in permit sales experienced in the last few years:

- 1) The current declining trend in visitation and consequently, permit sales, will not be further impacted by the minor increase in fees i.e., the decline in visitation will continue in line with the historic trend;
- 2) A portion (60 percent) of visitors previously purchasing season permits would no longer realize a savings by purchasing a season permit, but will, however, continue to visit the ISDRA four times per season⁵⁷ purchasing weekly permits for these visits. This, over the life of the plan, results in an increase of weekly permits sales and a decrease of seasonal permits sales;
- 3) Another portion (20 percent) of those visitors previously purchasing season permits would continue to visit five or more times during the season and would continue to benefit from and purchase a season permit;
- 4) The remaining portion (20 percent) of those visitors previously purchasing season permits would visit four times or less but still purchase a season permit for the convenience factor of making a single purchase and/or the expectation of making additional visits to the ISDRA;
- 5) Of all season permits sold, approximately 81 percent would be sold by Authorized Permit Vendors. As such, the BLM will receive \$7 less per permit on these sales than the retail price;

⁵⁷ Season Permit holders report visiting three to five times per year – averaged to four visits per season permit holder.

- 6) Approximately 8 percent of all weekly permit sales will take advantage of the BOGO \$10 Off discount provided through the BLM sales website⁵⁸; half of these sales will reflect a discounted unit price of \$25;
- 7) Approximately 16 percent of all weekly sales will continue to occur on-site, of which half will occur through Authorized Permit Vendors⁵⁹. Therefore, the BLM will receive \$2 less per permit on these sales than the advertised retail price;
- 8) The remaining 76 percent of weekly permits would be sold off-site by Authorized Permit Vendors and thus the BLM will receive \$2 less per permit on all these sales than the advertised retail price;
- 9) The permit price increase will be implemented on the schedule outlined in the proposal;
- 10) Excesses in fee revenue would be carried-over into future years;
- 11) Changing compliance levels and marginal shifts in sales patterns as visitors become accustomed to the new fee schedule are factored into this analysis as a one percent increase in the number of permits sale after all other assumptions (shifts in anticipated sales and visitation reductions etc.) have been calculated; and
- 12) An average of approximately 66,812 Special Area Individual SRPs will be sold annually⁶⁰.

Given the above assumptions, the following two tables (*Figure 4-2* and *Figure 4-3*) identify the distribution of anticipated permit sales over the life of the business plan.

Figure 4-2
Predicted Distribution of Season Permit⁶¹ Unit Sales 2014 – 2018

Financial Year	AVP Unit Sales	BLM Unit Sales	Total Season Permit Sales
2014	3577	839	4416
2015	3255	764	4019
2016	2995	702	3697
2017	2785	653	3438
2018	2618	614	3232

⁵⁸ This assumption is based on the rate of current sales through the official website (4 percent) considering an increase (doubling) due to the incentive of \$10 off.

⁵⁹ Assumption based on 2012 sales figures showing 8 percent of permits sold were sold on-site by Authorized Permit Vendors, which account for approximately half of all on-site sales.

⁶⁰ This number includes visitors who would have normally purchased a weekly permit, and those who have historically purchased seasonal permits, but would now purchase weekly permits.

⁶¹ Note that all season-permit sales will occur off-site under the proposed fee structure.

Figure 4-3
Predicted Distribution of Weekly Permit Unit Sales 2014 – 2018

Financial Year	BLM On-Site Unit Sales	BLM Off-Site Unit Sales	BLM Off-Site Discount Unit Sales	AVP On-Site Unit Sales	AVP Off-Site Unit Sales	Total Weekly Permit Sales
2014	5,578	2,789	2,789	5,578	52,987	69,719
2015	5,243	2,621	2,621	5,243	49,807	65,536
2016	4,981	2,490	2,490	4,981	47,317	62,259
2017	4,782	2,391	2,391	4,782	45,424	59,769
2018	4,638	2,319	2,319	4,638	44,062	57,976

Given the distribution of permit sales described above (*Figure 4-2* and *Figure 4-3*), this financial analysis estimates the average annual fee revenue from Special Area Individual SRPs over the life of the business plan would be approximately \$2,980,830, with a range from \$3.1 million in the highest visitation years down to \$2.85 million in the lightest visitation years (*Figure 4-4*).

Figure 4-4
Fee Revenue by Year in millions (\$)

2014	2015	2016	2017	2018
\$3.1	\$2.9	\$3.1	\$2.95	\$2.85

It is understood that what has been presented above is an oversimplified analysis based on figures averaged, over the 5-year life of the plan, generalized trends, and assumptions. It does, however, serve as a reference for anticipated fee revenue, which will be carried forward in this analysis to look at anticipated expenditures.

4.3.2 Revenue Summary

Given the proposed adjustments to fee structure and schedule, the combined recreational fee revenue streams i.e., visitor fees and vending fees, give anticipated revenue that will average \$3,060,000 over the life of the business plan. Added to the anticipated revenue from other funding sources (*Chapter 3, Section 3.3 – Revenue Sources*), the overall average revenue for the ISDRA may look like the following (*Figure 4-5*):

Figure 4-5
Anticipated Revenue (\$) from All Primary Revenue Sources

Funding Source	Estimated Average Annual Revenue (\$)
Appropriate Funding (Base)	\$1,059,000
Grants	\$429,000
All Fee Revenue	\$3,060,000
Total:	\$4,578,000

At this point, it's worth reflecting back to the figures presented in the discussion of revenues earlier in the document (*Figure 3-2*). This earlier discussion examined both the trend in revenues based on the last three- to five-years along with the average predicted contribution these revenue streams would make in the next five years based on "no action". The only difference between the above table (*Figure*

4-5) and the one previously presented (*Figure 3-2*) is the anticipated revenues in fees. The “no action” predictions resulted in combined (Special Area SRPs and Vendor SPRs) fee revenues of \$1,798,000, whereas the proposed fee structure and schedule result in over \$1.26 million more – this increase is both a result of the obvious increase in fees themselves, but also some assumptions that the fee structure will result in some changes to sales patterns.

The following table (*Figure 4-6*) is included to provide a year-by-year look at the anticipated revenues available for ISDRA management.

Figure 4-6
Anticipated Revenues (\$) by Year 2014 – 2018

Financial Year	Anticipated Consumable ISDRA Budget	Anticipated Grant Funding	Anticipated Vendor Fee Revenue	Anticipated Individual SRP Revenue	Overall Available Funds
2014	\$1,157,155	\$429,000	\$103,041	\$3,099,841	\$4,789,038
2015	\$1,099,297	\$429,000	\$89,646	\$2,894,730	\$4,512,673
2016	\$1,055,325	\$429,000	\$77,992	\$3,099,346	\$4,661,663
2017	\$1,013,112	\$429,000	\$67,853	\$2,957,700	\$4,467,666
2018	\$972,588	\$429,000	\$59,032	\$2,852,535	\$4,313,155
Totals:	\$5,297,477	\$2,145,000	\$397,565	\$14,904,153	\$22,744,194
Annual Average:	\$1,059,495	\$429,000	\$79,513	\$2,980,831	\$4,548,839

On a final note, as can be seen in the table above (*Figure 4-6*) the anticipated total available revenues in the first three-years exceed the \$4.496 million stated as needed to meet ISDRA management goals and objectives (*Chapter 3 – 3.1 – Levels of Service*). However, this surplus funding is needed to offset the revenues under the \$4.496 million received in the last two years. Consequently, if nothing changes from FY2019 on out, the ISDRA would once again be operating with overspent funds or in deficit. It is hoped, that a combination of factors from increased economic stability to the completion of a plan for ISDRA vending would contradict the trends and assumptions made in this document and ultimately stabilize both revenue streams and individual fee amounts to allow for the sustainable management of ISDRA recreation opportunities.

4.3.3 Anticipated Expenditures

Although the first few years of implementation of the adjusted fee schedule would provide revenue that exceeded the expenditures needed to meet the goals and objectives established for the ISDRA (*Chapter 3, Section 3.1 – Levels of Service*), it is prudent to establish how, and from what funding sources, a budget meeting the level of service previously described might be achieved to match the average revenue anticipated over the life of the plan.

The following table (*Figure 4-7*) represents the BLM’s predicted annual average expenditure by revenue source for each of the previously identified business lines (*Chapter 3 – Management and Budget*).

Figure 4-7**Predicted Average Annual Expenditures (\$) by Revenue Source for each Business Line**

Business Line	All Fees	Grants	Federal	Totals
Average Available Funds:	\$3,060,342	\$429,000	\$1,059,495	\$4,548,837
Administration & Management	-\$773,345	\$0	-\$276,655	-\$1,050,000
EMS & Visitor services	-\$515,769	-\$151,558	-\$44,673	-\$712,000
Law enforcement	-\$888,026	-\$145,761	-\$483,213	-\$1,517,000
Maintenance & Operations	-\$830,365	-\$131,681	-\$142,954	-\$1,105,000
Resource Protection & Monitoring	\$0	\$0	-\$112,000	-\$112,000
Average Total Expenditures	-\$3,007,505	-\$429,000	-\$1,059,495	-\$4,496,000
Average Carry Over:	\$52,837	\$0	\$0	\$52,837

As can be seen, both Grant and Federal funding would be exhausted i.e., spent up to the allocated amount, whilst fee revenue would be spent to achieve the budgeted amounts with any surplus carrying over to the following years. It is essential that funding is spent this way, and not spent or exhausted prior to using grants or federal appropriations to ensure carry-over for the following year.

4.4 Market Assessment

The market assessment reviews existing fees for similar recreation opportunities. The purpose of presenting this information is to establish whether the proposed fees are set at “Fair Market Value,” and to serve as a comparison between fees for areas offering similar opportunities. It is worth noting prior to this discussion that the opportunities and services provided at the ISDRA are somewhat unique, as are the management challenges, and although comparisons can be drawn, they only serve as a guide.

4.4.1 Visitor Fees

The following (*Figure 4-8*) describes the visitor-fee structure and schedule at sand dune areas offering similar recreational experiences and opportunities – although provided types, levels of services, and facilities do differ.

Figure 4-8
Fee Comparison between Areas Offering Similar Experiences and Opportunities to the ISDRA

Location	Daily Fee⁶²	Weekly Fee⁶³	Seasonal Fee⁶⁴
Proposed ISDRA, CA ⁶⁵	N/A	\$35 Off-Site \$50 On-Site	\$150 Off-Site
Dumont Dunes Recreation Area, CA	N/A	\$30 non-Holiday \$40 Holiday	\$90 non-Holiday \$120 Inc. Holidays
Sand Mountain Recreation Area, NV	N/A	\$40	\$90
Little Sahara Recreation Area, UT	\$18 \$9 Second Vehicle	(\$126)	\$120
St Anthony Sand Dunes, ID	\$5	(\$35)	\$60
Coral Pink Sand Dunes (BLM), UT	\$5	(\$35)	N/A
Coral Pink Sand Dunes (State), UT	\$22 ⁶⁶	(\$154)	\$75 ⁶⁷
Oceano Dunes State Vehicle Recreation Area, CA	\$15	(\$105)	N/A ⁶⁸
El Mirage OHV Recreation Area, CA	\$15	\$30	\$90
Average:	\$13.33	\$57.77	\$92.14

Due to variances in how fees are charged and discounts offered, summarizing this data is not clear cut. That said, however, given the most expensive combinations i.e., without considering any discount, some averages can be calculated for comparison with the ISDRA fee adjustment proposal. The average daily-use fee (including overnight stay) costs \$13.33 per vehicle per day, with the average weekly permit costing \$57.77 per week. Seasonal permits⁶⁹ aren't available at all sites, but when available, the average cost is \$92.14, although the range is from \$60 to \$120. The proposed adjusted-fee structure and schedule for ISDRA weekly permits is in line with these averages in that, at its most expensive, a weekly permit would cost \$50; approximately \$8 less than the average weekly permit fee for similar opportunities and experiences. As proposed, season permits for the ISDRA are essentially \$58 above the average and would represent the most expensive season permit available for similar areas/activities by \$30.

4.4.2 Vending Fees

Since the Vending Permit fee is not proposed to be adjusted no market analysis is included in this business plan. All previously published material in the Draft 2012 Business Plan (BLM, 2012) concerning the market analysis of vending fees has been removed.

⁶² Daily Fee has been calculated to include overnight fees if charged separately, so as to be comparable with the proposed ISDRA fee which always includes overnight stays.

⁶³ If a weekly fee is not available, it has been calculated based on the daily fee (including overnight stay) for a seven-day period and is presented in parentheses.

⁶⁴ The length of season for different areas ranges from a few months to an entire year.

⁶⁵ Not included in the averages.

⁶⁶ Utah Seniors (62+) would only be charged \$19 for the same visit.

⁶⁷ A Senior Adventure Pass is available for \$35.

⁶⁸ An annual permit that only includes day use is available for \$50 but isn't directly comparable as overnight visits would cost an additional \$10 per vehicle per night.

⁶⁹ Seasonal permits for day use only have not been included in this average.

Chapter 5: Social and Economic Impacts

Social and Economic impacts are those changes in visitation and the local communities that may result from the proposed fee adjustment. BLM policy and guidance dictates that any business plan must evaluate these impacts, with specific regard to low income or impoverished communities and minorities – which are collectively termed “underserved communities.” In addition to describing these impacts, this section also examines the potential impact to local business, including ISDRA vendors.

5.1 Impacts to Visitor Demographics

The impact to visitor demographics serves as a proxy to describe the social impacts of the proposed adjusted fee. Before beginning this discussion, it’s worth revisiting the visitor demographics section of this document (*Chapter 2, Section 2.4 – Visitor Demographics*), which can be summarized as the following (Haas, 2008):

- The vast majority of visitors responding to surveys (83 percent) described themselves as Caucasian (white);
- The majority of visitors (72 percent) are male;
- The average age of visitors is 40;
- The average distance travelled to the ISDRA is 205 miles;
- The vast majority of visitors (91 percent) have a high school education or higher; and
- Most visitors (91 percent) earn more than \$40,000 annually.

This means that the average ISDRA visitor is a middle-aged, middle class, white male with some college education and lives in the vicinity of San Diego, Los Angeles, the Inland Empire, or Phoenix. The average ISDRA visitor is therefore not considered to be part of an underserved community.

Given consideration to the above demographics, however, 8 percent of visitors may live at or below poverty level⁷⁰. These individuals could be considered to be underserved and impacted by the fee adjustment. As such, a fee increase of \$10 per week may increase financial stress on these individuals. It is, however, worth considering this increase in the context of the overall cost of visitation.

On average, each primary vehicle that visits the ISDRA spends \$1,182 per trip (Collins, 2007). At the current permit rates, visitors have the opportunity to purchase a weekly permit for \$25 per week, approximately 2.1 percent of the average cost per trip. The proposed adjustment to \$35 equates to just 2.9 percent of the overall cost of the trip. Considering that through a discount program, permits are available at \$25, and that the length of the fee season has been shortened, those unable to pay this negligible increase would still have access to the opportunities and experiences provided at the ISDRA. It’s worth noting that if the average vehicle driven to the dunes has a gas tank of 28 gallons, and

⁷⁰ The Department of Health and Human Services poverty guidelines define poverty for a family of four at an annual income level of \$23,050 (Federal Register Volume 77, Number 17, Thursday, January 26, 2012, Pages 4034-4035.)

requires filling up once to reach the ISDRA and once to return, gasoline prices would need only increase approximately \$0.18 to have the same financial impact.

With regard to majority ethnic populations, although most of the visitors to the ISDRA describe themselves as being of white ethnic background, the second largest ethnic group is described as “Hispanic, Latino, or Spanish”. Since the ISDRA is located in Imperial County, California, which reports that 80 percent of its population is either Hispanic or Latino, and the next nearest city is in Yuma County, Arizona, with 60 percent reporting the same ethnic background (US Census, 2010), these ethnic populations have a greater ease of access to the ISDRA. Within Imperial County, the poverty level is also higher than average: 21.4 percent (U.S. Census Bureau, 2011). However, it is expected that given the shortened-fee season, local residents would benefit from less-expensive off-season day trips to the area.

The education level of ISDRA visitors is high, with more than 70 percent of the ISDRA visitors having some level of post high school education; less than 1 percent having an education below the high school level. Adjustments to the fee structure and schedule are therefore, not expected to significantly impact visitors with less education. The BLM will ensure that communication, marketing, and education efforts regarding the fee adjustments are adequately explained to all education levels of ISDRA visitors.

Although BLM does not have statistics on the percentage of disabled visitors to the ISDRA, the 2010 U.S. Census reports that 19 percent of the U.S. population has a disability. In order to address the needs of this population, BLM has retrofitted facilities to improve physical access, develops web sites, displays, and educational materials for the hearing, sight, and physically impaired. The changes in the proposed alternative are not expected to significantly impact disabled visitors.

The majority of the visitors to the ISDRA do not fall into the underserved community description. However, through public feedback, the BLM has received requests to address the fee impact to local visitors. These visitors reside in the local communities of Brawley, Imperial, El Centro, Yuma, and other smaller Imperial and Yuma County towns and cities and are among those requesting a local visitor discount or day-use permit. Local residents likely get greater benefit from a season permit than do most visitors as they can better pick prime times for recreating on the dunes. Though they may stay just a few hours per day, they can choose to visit multiple times per week. They’re also better able to take advantage of no fees during the off-season as they have the flexibility to choose to recreate in the cooler hours of early morning or late evening.

5.2 Impact to local businesses

Visitation to the ISDRA has a major economic impact on both local communities and on those industries related to OHV recreation. For example, during the October 2005 to May 2006 season, ISDRA visitors spent \$414 million on their trips (\$1,182.37 mean expenditure multiplied by 350,000 primary-vehicle visits) (Collins, 2007). It’s estimated that the dollars spent in gateway communities ranged between 18.4 million and 320.7 million during the same period. Assuming that visitors spend the majority of their dollars (i.e., closer to the \$300 million) in the gateway cities they travel through to get to the ISDRA region (Collins, 2007), between:

- \$72.6 and \$128.3 million was spent in Brawley;
- \$47.2 to \$83.4 million in El Centro;
- \$16.3 to \$28.9 million in Blythe/Palo Verde; and
- \$41.7 to \$73.8 million in Yuma.

This financial benefit to gateway communities comes from ISDRA visitors making local purchases and using local services on their way to and from the dunes -- and in some cases, during their visits.

Given the above information, it is of considerable concern to local communities how a fee adjustment would impact these local expenditures. As previously stated (*Chapter 4, Section 4.3 – Financial Analysis*), the BLM does not believe the proposed-fee adjustment would accelerate the declining trend in visitation. However, the financial benefit to local businesses would continue to decline with this trend. Additionally, this trend would not be expected to change with either the continuance of the current fee schedule or a reduction of fees given that the recreational fee makes up just 2 to 3 percent of the average ISDRA visit. Recalculating the estimated contribution to local communities based on predicted visitation 295,000 primary vehicles (*Chapter 2, Section 2.3 – Recreation Use*) would reduce revenue to local communities by \$70 million to \$348.8 million.

Besides the aforementioned direct benefits to local businesses from visitation, the program to use Authorized Permit Vendors would continue to contribute to local and regional businesses involved in the program. During the FY 2011 visitation season, approximately 80 percent of the ISDRA permits were purchased off-site through private commercial establishments. Many of these businesses are located in the gateway communities, along travel routes to the ISDRA, and in the outlying regional metropolitan areas of San Diego, Los Angeles, and Phoenix. Most of the businesses are off-highway vehicle stores and convenience / gas stations. These businesses use the draw of permit purchases to entice customers into their establishments. Anecdotal reports show that approximately 75 percent of the customers that enter businesses to buy an ISDRA permit also purchase fuel or other merchandise. These transactions increase the economic benefit to the establishment and the gateway communities through increased tax revenue. In addition to the merchandise sales, the businesses also are allowed to, and would continue to be able to, purchase the permits at a wholesale rate.

5.3 Impacts to ISDRA Vendors

ISDRA vendors are impacted in two ways by the fee adjustment proposal, directly by the changes to the wholesale pricing of visitor permits, and indirectly by changes in visitation i.e., a reduction or increase in the number of potential customers.

Based on the existing fee structure and schedule, vendors are currently afforded a 10 percent commission on permit sales. The proposed fee structure and schedule would reduce these commissions to a flat \$2 for weekly permits and not be authorized to sell season permits within the ISDRA. In 2012, season permit sales brought in approximately \$5,500 in additional revenue to ISDRA vendors. This source of revenue would no longer be available. In the same period, the sale of weekly permits added approximately \$16,500 to the overall revenues of vendors; under the proposed fees this number would

essentially be halved to a little more than \$8,000 if the same numbers and proportions of permits were sold as in 2012. Based on all the assumptions used in the business plan⁷¹ anticipated revenues for ISDRA vendors based on the on-site sales of weekly permits would average approximately \$10,000 per year over the life of the plan.

All the assumptions in this business plan are based on the declining trend in visitation. This indirectly impacts ISDRA as the pool of potential customers is declining by an average of 2 percent annually. Over the life of the plan, that's an anticipated reduction in visitation of 10 percent. This reduction may or may not directly correlate to reduced sales of goods and services, but it certainly makes sense that a reduction of this many visitors has the potential to adversely affect the ISDRA vendors' bottom lines.

⁷¹ The assumptions in the business plan can be summarized as an overall decline in the number for visitors, and thus total permits sold, but a marginal increase in the number of weekly permits sold (as a result of the increased price of a season permit)

Chapter 6: Public Participation

Section 804 of the Federal Lands Recreation Enhancement Act (FLREA; PL 108-447) requires the Secretary of the Interior to provide the public with an opportunity to participate in the establishment and implementation of recreation fees. In response to FLREA, the Secretaries of Agriculture and the Interior published their public involvement requirements under the title “Notice of Guidelines for Public Involvement in Establishing Recreation Fee Areas and for Demonstrating How the Public Was Informed on the Use of Recreation Fee Revenues” (Federal Register, Volume 70, No. 187, dated September 28, 2005, pages 56622 and 56623). The public participation process used for this fee development and implementation process has followed and expanded these minimum guidelines.

In addition to the public at large, input and feedback from stakeholder groups, including those representing recreational users and other agencies and entities (e.g., counties, business groups, etc.) are a critical component to the overall public process. These interests are generally represented through the Desert Advisory Council and its ISDRA Subgroup, a subset of the advisory council whose focus is ISDRA-related issues, and as appropriate, continues to be a conduit for public participation.

6.1 Issues Identified in Scoping

Public scoping was carried out through the Desert Advisory Council ISDRA Subgroup meeting. This public meeting was held on August 10, 2010 and attended by subgroup members, BLM staff, and a few members of the public. The meeting did not specifically identify issues that needed to be addressed by the ISDRA BP, but did focus on important steps the ISDRA subgroup would like carried out during the development of the business plan. These steps focused around public involvement and communication of the planning effort, the resulting fee structure, and schedule. Many of the items presented during this discussion of process have been incorporated into the preparation of this document, including a public-comment period, discussed below, and the use of social media as a tool to distribute information. The specific items resulting from this meeting can be found in the 2012 Draft Business Plan (BLM, 2012) and the publically available minutes for the subgroup meeting⁷². In addition to the discussion of process, a number of ideas concerning how fees could be modified occurred. The 2012 Draft Business Plan (BLM, 2012) presented these ideas as a table; this information, still valuable, has been reformatted, expanded upon, and is presented in *Appendix B – Fee Structure and Schedule Concepts*.

6.2 Public Comments on Draft

The 2012 Draft Business Plan (BLM, 2012) was released for a 45-day public-comment period on October 18, 2012. The comment letters received ranged from single lines stating opposition to fee increases to substantial discussion of deficiencies in the document and recommendations for improving both the document and the proposed structure and method of fee implementation. In total, 236 written comments (formal letters and emails) were received.

⁷² <http://www.blm.gov/ca/st/en/fo/elcentro/recreation/ohvs/isdra/dunesinfo/funding/dsgdocs.html>

On February 6, 2013, the BLM published⁷³ on its ISDRA website, the ISDRA Public Comment Content Analysis (BLM, 2013). This document contains a detailed explanation of how the comments were processed and an analysis of their content. This document is incorporated here by reference and should be referred to for specifics regarding the content of the public comments. In summary, the comments fell into 10 main themes ranging from criticism over the lack of information in the draft, to questions of the legality of the proposed-fee structure. These comments are not, and will not be, specifically answered. However, many of the changes between the draft and this document are a result of this analysis and the underlying comments.

6.3 Changes between Draft and Final

The following section highlights the changes resulting from public comment and internal review between the 2012 Draft Business Plan (BLM, 2012) and the ISDRA BP (this document) and serves as a cross walk between the two documents.

The most notable change has been a total overhaul of the format of the document. The document is now divided into eight chapters grouping key sets of information. Details of the content of each chapter can be found in the *“Readers Guide to the Document”* and the *Table of Contents*. In addition to this change in overall format, the document now only presents the proposed-fee adjustment within the body of the document, rather than alternative-fee structures presented in the draft. This change serves to aid in understanding of the actual fee adjustment being proposed. Other fee structures and schedules considered, along with an expanded section on the concepts for fee collection generated in scoping, can now be found under the sections entitled *“Alternatives Considered but Eliminated”* and several of the appendices.

The second most notable change, and possibly the most critical, occurs in the proposed-fee structure and schedule. This is specifically described in *Chapter 4 – Fee Proposal*, but basically reflects a smaller increase in visitor fees than originally proposed in the 2012 Draft Business Plan (BLM, 2012), as well as the removal of any change to the structure of fees pertaining to commercial vending in the ISDRA.

Other changes include the addition of more detailed financial information pertaining to expenditures (*Chapter 3, Section 3.2 – Operating Expenditures*), revenue sources (*Chapter 3, Section 3.3 – Revenue Sources*), and the financial analysis (*Chapter 4, Section 4.3 – Financial Analysis*). This additional detail has been provided at a level similar to, and in many cases derived from, financial documents already published pertaining to ISDRA management, including “annual fee reports” and grant applications. This more-detailed financial information is accompanied by additional narrative regarding the levels of service currently provided in the ISDRA (*Chapter 3, Section 3.1 – Levels of Service*) and a deeper explanation of the regulation, policy, and planning that has shaped overall management of the area. The combination of more-explicit financial information, and the presentation of more detail regarding

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<http://www.blm.gov/style/medialib/blm/ca/pdf/elcentro/isdra.Par.14793.File.dat/Final%20ISDRA%20Business%20Plan%20Public%20Comment%20Content%20Analysis%20-%20EA%20edits.pdf>

existing planning decisions, serves to solidify the rationale and justification for the proposed-fee adjustment (*Chapter 1, Section 1.4 – Rationale and Justification for Fee*).

Of final note, there are changes – revised and additional narrative - to enhance other sections of the document, including a clarified Project Area description (*Chapter 2 – Project Area*), revised language in the Market Assessment (*Chapter 4, Section 4.4 – Market Assessment*), additional and up-to-date information regarding the public process (*Chapter 6 – Public Participation*) and a clarified social and economic impacts discussion (*Chapter 5 – Social and Economic Impacts*).

6.4 Communication Plan

On February 6, 2013, the BLM published⁷⁴ on its ISDRA website, the ISDRA BP Communication Plan (BLM, 2013) that detailed the communication strategy that has been, and will continue to be, followed through the planning process and final implementation of the adjusted fee structure and schedule within the ISDRA. This document is incorporated here by reference and should be referred to for specifics regarding the communication process for the remainder of the business plan, up to and including, presentation to the Recreation Resource Advisory Council (R/RAC) and publication of the final fee structure and schedule. Additional details concerning the specific R/RAC process are included in the Process section at the beginning of this document.

Once the final fee structure and schedule is published, communication efforts will be modified to enhance the focus on ISDRA visitors and the following two key messages:

- 1) Current Fee structure and schedule – and enforcement: information will clearly and specifically contain the fee amounts, who needs to purchase a permit, where permits can be purchased, how permits will be checked, and the penalties for failure to hold a permit.
- 2) Expenditure of fee revenue: information will highlight how fee revenue is being spent and where cost-saving measures have been implemented. At a minimum standard, the annual reporting requirements established in regulation – described below in the section titled Annual Reporting, will be adhered to. As appropriate, information may also be provided about other ISDRA revenue sources and expenditures to offset use of fee revenue.

Although many of the outreach efforts and techniques presented in the ISDRA BP Communication Plan (BLM, 2013) will continue to be used, an emphasis will be placed on distribution of fee information through stakeholder groups and at BLM facilities. Social media and the internet will continue to be the most critical component of the communication strategy.

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http://www.blm.gov/style/medialib/blm/ca/pdf/elcentro/isdra.Par.44181.File.dat/FinalDraft_ISDRA%20Communication_Plan%20EA%20edits.pdf

6.5 Marketing Plan

In terms of recreation permits, marketing is different from communication in that it promotes the sale of permits, rather than merely acknowledging the need for, and price of, permits. The BLM does not engage in marketing itself and is generally prohibited from directly paying for advertising. Marketing, however, is a useful tool to increase awareness and achieve a higher level of compliance. Commonly, marketing is more “flashy” than mere communication and tends to resonate well with ISDRA visitors and the recreating public as a whole. As such, the BLM will continue to provide support for marketing efforts by permit vendors, as well as through its contracted services that specifically aid in the dissemination of key messages identified in the communication plan.

6.6 Visitor Feedback

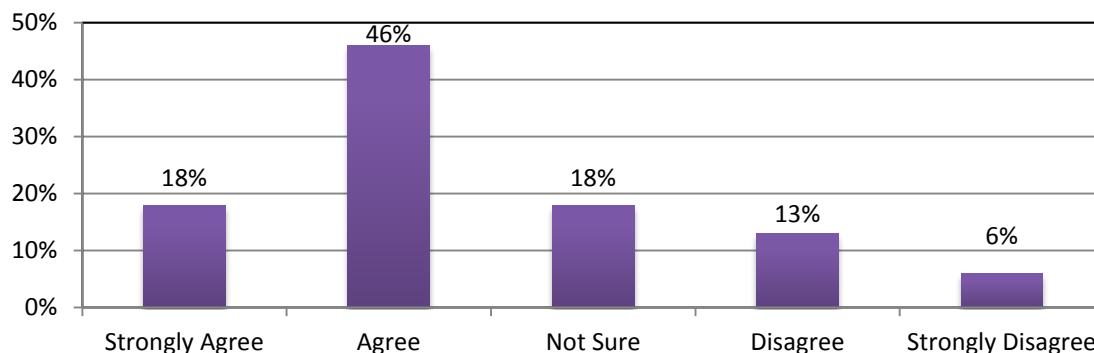
Visitor feedback plays a critical role in ISDRA management. At its core, it serves as a mechanism to ascertain if the planning goals and objectives are being attained. But it also serves as an instrument through which adaptive management may occur. As such, the BLM uses both informal feedback techniques, such as face-to-face contacts, and feedback received through the ISDRA website and Facebook pages, as well as formal visitor feedback techniques such as satisfaction surveys and evaluations. The following are recent visitor studies conducted in the ISDRA that have aided in the development of the ISDRA Business Plan:

- United Desert Gateway Visitor Survey, 2012
- University of Idaho Visitor Satisfaction Study, 2011
- Tread Lightly! Evaluation, 2011
- CA Recreation Fee Program Evaluation Government Accountability Office, 2008
- United Desert Gateway Visitor Profile ,2006
- ISDRA Technical Review Team Survey, 2005
- Government Accountability Office Recreation Fee Report, 2001

The following represent a few highlights from these studies that have, along with public participation and internal review, helped shape the proposed fee structure.

Figure 6-1
Value for Money (University of Idaho, 2011)

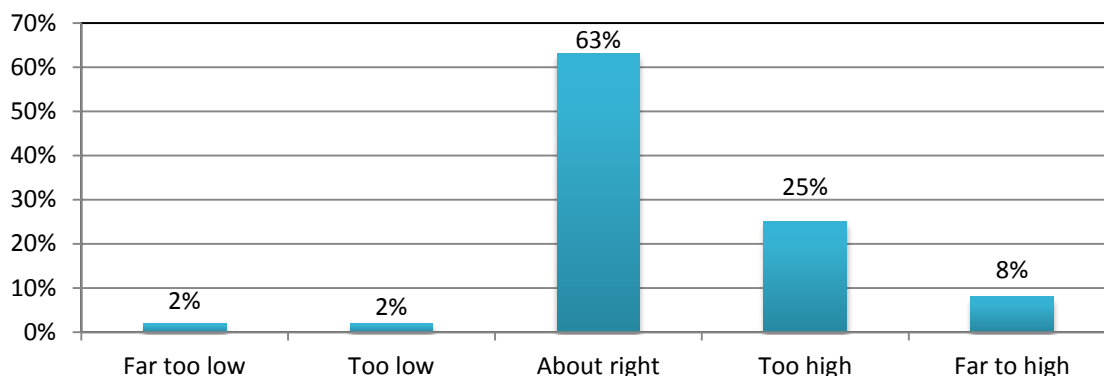
Do you agree with the statement: The value of the recreation opportunity was at least equal to the fee asked to pay.



The above figure (*Figure 6-1*) indicates that of those surveyed, more than half (64 percent) felt they received fair value (or better) in recreational outcomes for the fee they were asked to pay. The assumption can be drawn that these people felt the current fees commensurate to the services being provided.

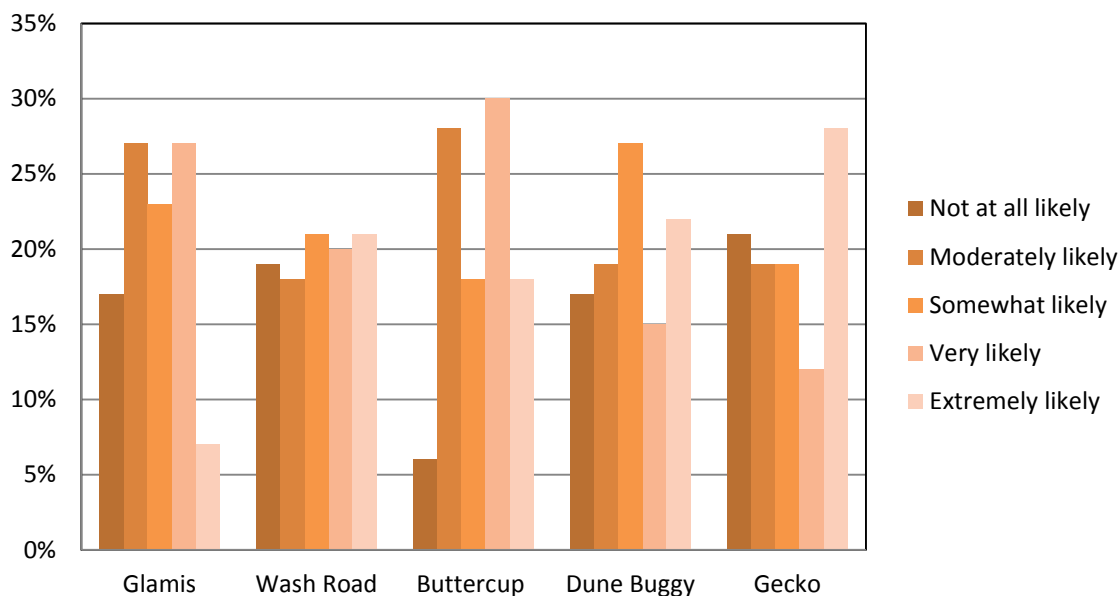
The figure below (*Figure 6-2*) shows that 63 percent felt the current fees were appropriate with only 4 percent believing the fee to be too low. One-third of those surveyed felt the fee was too high.

Figure 6-2
Amount of Fee (University of Idaho, 2011)
Question: How appropriate was the fee charged for this site/area?



The figure below (*Figure 6-3*) indicates that less than half (40 percent) were very, or extremely likely, to cease visitation on holiday weekends if the permit price increased only for those weekends.

Figure 6-3
Change in Visitation Pattern (United Desert Gateway, 2006)
Question: How likely would you be to avoid the ISDRA on holiday weekends if the price increased for those weekends?



6.7 Annual Reporting

Section 804(c)(2) of the Federal Lands Recreation Enhancement Act (FLREA; PL 108-447) and the BLM Recreation Permits and Fees Manual Section (2930.06B6j) require the posting of an annual report covering the expenditure of recreation fee revenue. This report has been, and will continue to be, prepared and posted in the ISDRA at the ranger stations and displayed on the ISDRA web page. Appendix C includes an example of the publically available report for the 2012 operating period.

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Acronyms, Abbreviations and Glossary

ATV	All-Terrain Vehicle
BLM	US Department of the Interior, Bureau of Land Management
BOGO	Buy One Get One
CBS	Central Billing System
CDCA	California Desert Conservation Area
CDD	California Desert District
CFR	Code of Federal Regulations
EMS	Emergency Medical Services
FBMS	Financial and Business Management System
FLPMA	Federal Land Policy and Management Act
FLREA	Federal Land Recreation Enhancement Act
FTE	Full Time Equivalent
ISDRA	Imperial Sand Dunes Recreation Area
LUP	Land Use Plan
OHV	Off Highway Vehicle
OHMVR	Off Highway Motor Vehicle Recreation
PII	Personally Identifiable Information
RAC	Resource Advisory Committee
RAMP	Recreation Area Management Plan
RMIS	Recreation Management Information System
RMP	Resource Management Plan
R/RAC	Recreation Resource Advisory Committee
SAR	Search and Rescue
SRMA	Special Recreation Management Area
SRP	Special Recreation Permit

APPROPRIATED FUNDING	Federal funding provided through a congressionally approved budget.
AUTHORIZED PERMIT	Those businesses that have asked and been approved to be able to sell
VENDOR	ISDRA Recreation Permits on the behalf of the BLM.
A VISIT	The count one person entering public lands and engaging in a recreational activity for any period of time. For the ISDRA, this is calculated by multiplying the raw vehicle count by a factor of 3.5 to account for the number of occupants in a vehicle.
BASE FUNDING	Federal funding received each year to cover general program management. Base funding is divided into a number of Functional Areas that all contribute to ISDRA management.
BUSINESS LINE	One of the subdivisions of overall ISDRA management used throughout this document to aid in understanding of how funds are budgeted and spent, and the work achieved.
BUSINESS PLAN	A written document that describes the objectives of a fee program and

	how those objectives will be achieved through identification of a fee structure and schedule
CONSUMABLE BUDGET	That portion of appropriated funding, including any carry-over from a previous year, available to be spent within a Functional Area or on a specific project.
DIRECTED FUNDING	Federal funding received tied to a specific need or project.
FEE AREA	The geographic area in which recreation fees will be charged for certain activities, services and facilities.
FEE SCHEDULE	The amount of the fee(s) charged for the different services, activities and/or facilities.
FEE STRUCTURE	The breakdown of how, and what for, a fee is charged.
FUNCTIONAL AREA	A BLM account string where funding is provided to a specific program area i.e., there are separate functional areas for Recreation, Law Enforcement, Maintenance, Wilderness, Planning, Cultural Resources, etc.
VEHICLE COUNT	A count of the number of times vehicles cross a counting mechanism. For the ISDRA magnetic counters are used at key locations to estimate overall visitation.

Appendices

Appendix A – Detailed Area Information

The ISDRA can be divided into seven main areas for the purposes of describing the overall environment range of facilities and services available within the area. In addition to these seven main areas within the ISDRA, this project also considers the area outside, but immediately adjacent to, the ISDRA for the purposes of charging fees. The rationale for a fee area that expands outside the ISDRA is described in *Chapter 2 – Project Area*, but is basically the need to ensure that visitors don't camp and stage on public lands immediately adjacent to the ISDRA to "dodge" the fees.

Mammoth Wash Area

The Mammoth Wash Area is located in the extreme northwest end of the ISDRA. It is bordered on the north by private land, on the south by the North Algodones Dunes Wilderness, on the east by the railroad, and on the west by the Coachella Canal. The remote access serves as an attraction for some who desire a more semi-primitive motorized-recreational opportunity. OHV recreation at Mammoth Wash is light with estimates of 10-15 groups utilizing the area on major holiday weekends. OHV recreational activity during the week is minimal, with many weekdays seeing no OHV visitation.

North Algodones Dunes Wilderness

Activities in the North Algodones Dunes Wilderness include photographic activities, sightseeing, walking, hiking, backpacking, camping, nature study, horseback riding, hunting, and wildlife viewing. No mechanized vehicles (OHVs, motorcycles, bicycles, hang gliders, motorized equipment, or motorboats) are allowed. Primitive camping is available. On both non-holiday and holiday weekends the level of use is low. A Watchable Wildlife Site is available to visitors on the east side of the wilderness. It has an information kiosk, interpretive panels, and a parking area to access the wilderness.

Glamis Area

The Glamis Area is located south of Highway 78 and west of the railroad. The area adjacent to Highway 78 and Glamis is flat, sandy and is a favorite camping spot for thousands of dunes enthusiasts. This area is used for camping, OHVs, and commercial vending.

Glamis has become the main area for visitors to purchase goods and services from vendors and local private businesses. The permitted vendors have historically used a specific area and pattern to setup for sales. This area has become known as "Vendor Row" or "The Mall." During peak periods, this area can experience intensive OHV traffic.

Camping in this area takes place in the natural flat hard-surface pockets and up to the fringes of the dunes. Camping occurs in large groups that form "wagon circles" of recreational vehicles that create a desirable atmosphere for visiting with friends and family.

Gecko Road Area

The Gecko Road Area lies immediately east and west of Gecko Road. It includes Gecko Road, all the adjacent pads and campgrounds, and the Osborne Overlook area. Cahuilla Ranger Station is located adjacent to Gecko Road just south of Highway 78. The station is the focal point of the entire ISDRA operations and is a designated location for visitors to seek assistance. A trash-collection facility and toilets are located just south of Cahuilla Ranger Station and are accessible to all visitors.

Along the eastern boundary of the Gecko Road Area and the western boundary of the Glamis Area are dunes that are considered by some to be the best OHV area in the ISDRA. The area consists of large and steep bowls that can be traversed from one to another by crossing over razor back ridges. OHVs can reach high speeds while the centrifugal force holds them to the face of the bowl as they drive around the bowl.

There are eight hard-packed, BLM-constructed, camping areas along Gecko Road. From north to south, they are named Cement Flats, Pad 1, Pad 1 ½, Pad 2, Pad 2 ½, Pad 3, Pad 5, and Pad 4. There are no other amenities at any of these sites, except at Cement Flats, which has a vault toilet.

There are three asphalt loop campgrounds that extend from Gecko Road. Gecko Campground consists of two main loops and Roadrunner Campground is located at the end of Gecko Road and consists of an asphalt loop. Both Roadrunner and Gecko Campgrounds have vault toilets. The Keyhole Campground is located just north of Roadrunner Campground and consists of one asphalt loop with no other amenities.

Osborne Overlook is located approximately two miles east of Gecko Road and south of Highway 78. There is a short access road that leads to a rough, hardened-surface overlook. There is post and cable fencing surrounding the edge of the surface, a shaded picnic table, and a dedication monument at the site. Camping and day-use parking are available.

Ogilby/Dunes Vista Areas

The Ogilby/Dunes Vista Areas are located in the southeast corner of the ISDRA just north of Interstate 8. They are bordered on the north by Pilot Knob Mesa, on the south by Interstate 8, on the east by the Ogilby and Ted Kipf Roads, and on the west by Patton Valley. The Ogilby Area is a popular OHV area for families and groups that seek a natural recreational opportunity and camping at a site away from the intensively used areas of the ISDRA, yet accessible by road.

Weekday OHV recreation in the Ogilby / Dunes Vista areas is minimal. This primitive camp is a popular site utilized by families and groups that prefer camping in an area that receives low to moderate OHV-recreational activity.

Dune Buggy Flats Area

The Dune Buggy Flats Area is located north of Interstate 8 along the western border of the dunes. This area is used for camping, OHVs, and commercial vending. The Dune Buggy Flats Area provides open dispersed camping on a hard-packed flat area. The main area is bordered on two sides by irrigation

canals. This area has seen an increased level of visitation and activity since the implementation of the fee program and is accessed from the Gordons Well exit off Interstate 8. The majority of the camping occurs east of the New Coachella Canal. Vault toilets are provided near the access road. The area west of the canal and within the Area of Critical Environmental Concern was closed to camping in 2001 as mitigation for the construction of the Herman Schneider Memorial Bridge. This bridge created a safe and legal route of travel for OHVs between the Buttercup and Dune Buggy Flats Areas.

Buttercup Area

The Buttercup Area is located south of Interstate 8 to the U.S. / Mexico Border and is used for camping, OHVs, site seeing, commercial vending, education, filming, and rights of way. Camping occurs along many points of Grays Well Road, the main access road that runs parallel to Interstate 8. The main camping areas in this management area are the Aguilar Road, near the Plank Road, Midway Campground, and Grays Well. All of the above sites have vault toilets, trash dumpsters, and hard-packed camping space for camping and OHV access. Buttercup Ranger Station is located near the Interstate access and is staffed by BLM and volunteers to serve visitors.

The major OHV destination point in this management area is Buttercup Valley Competition Hill. On the north end of the valley, OHV enthusiasts use the steep leeward side of the dune for challenge and competition.

The Plank Road Historical Site lies just south of Grays Well Road and approximately at the midpoint of the road. There is a portion of the Plank Road that is protected with fencing and there are several interpretive panels. The Plank Road is a destination-site for tourists and passing motorists.

Fee Area adjacent to ISDRA

(Outside ISDRA recreational boundary but within the fee-area boundary)

The fee area extends one-mile beyond the perimeter around the ISDRA boundary to the west, east and north. The three management plans covering these areas are the Imperial Sand Dunes Recreation Area Management Plan (RAMP), the Western Colorado Desert (WECO) and the North Eastern Colorado Desert (NECO). The purpose of this fee area is to reduce the impacts of activities related to the ISDRA on lands outside the ISDRA boundary. Lands surrounding the ISDRA are currently managed as limited access or closed. The area encompasses sand and gravel mining, military bombing ranges, private lands, habitat areas for the desert tortoise, and management areas for the flat-tailed horned lizard. It is used for OHVs, camping, hunting, and military exercises.

The fee area northeast of the railroad tracks, near Ted Kipf Road, experiences relatively low visitation. Recreation activity that does occur is limited to the existing roads and trails.

Appendix B – Fee Structure and Schedule Concepts

The following concepts regarding what the proposed ISDRA fee structure and schedule should entail were expressed during the ISDRA subgroup meeting. This information was presented in the 2012 Draft Business Plan (BLM, 2012) and has since been expanded upon as a result of public comment and internal review.

Charge by OHV

An OHV [NTH1] is defined in the California Vehicle Code, Division 16.5, section 38012, and includes but is not limited to, the following: (1) a motorcycle or motor-driven cycle, (2) a snowmobile or other vehicle designed to travel over snow or ice, (3) a motor vehicle commonly referred to as a sand buggy, dune buggy, or all-terrain vehicle, (4) a motor vehicle commonly referred to as a jeep, (5) a recreational off-highway vehicle.[PDW2] An OHV is defined differently under federal regulations. An OHV (or Off-Road Vehicle per BLM Manual 1626.09) [NTH3] is defined in BLM regulation (43 CFR 8340 0.5(a)) as any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: (1) Any nonamphibious registered motorboat; (2) Any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) Any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) Vehicles in official use; and (5) Any combat or combat support vehicle when used in times of national defense emergencies. As such, every vehicle publically operated in the ISDRA would be charged e.g., RVs, automobiles, sandrails, UTVs, ATVs, motorcycles etc.

Enforcing a fee on every OHV would require increased overhead costs due to the need for increased levels of enforcement. Under the current system, there are fewer vehicles that must be checked for compliance (Primary vehicles) compared to the total number of OHVs. Most of the primary vehicles are also large, stationary, and limited to the historic camping areas on the perimeter of the ISDRA. OHVs would increase the difficulties of fee compliance because there are more of them, they can be hidden in enclosed trailers and toy haulers, and move for many hours in the day into the deep dunes. The difficulties of fee enforcement, and cost of implementation, deem this fee structure impractical.

Use a Similar Program as Tonto National Forest (watercraft)

The Tonto National Forest issues a daily (24-hour) pass allowing access to more than 50 recreation sites. The pass costs \$6 per vehicle and an additional \$4 per watercraft⁷⁵. This is an expanded amenity fee and in the BLM considered a Recreation Use Permit, as opposed to a Special Recreation Permit. Although the BLM could implement a similar system for motor vehicles with an additional charge for each

⁷⁵ Information source: http://www.fs.usda.gov/detail/tonto/passes-permits/?cid=fsbdev3_018749

registered OHV, enforcement would require a significant increase in personnel. Although check points could be established at all major entrances and reduce the workload, compliance checks would still be difficult as often OHVs are packed in enclosed trailers or a toy hauler, which for fee-collection purposes, the BLM has no authority to require the owner to open for inspection. In addition, this particular fee schedule may increase the fees beyond what the BLM is proposing. For example, a family arriving Friday for a weekend with toy hauler, primary tow vehicle, and four quads, the primary tow vehicle is required to pay \$6/day (\$18 total) and each quad required to pay \$4/day (\$48) for a total fee cost of \$66 for the weekend – which is a greater dollar amount for less than half the time provided by the proposed ISDRA fee adjustments.

Fee Collection Achieved Solely by BLM (no fee contractor)

This idea was given consideration in developing the business plan, however for a number of reasons including the federal government Human Resource policies (i.e., inability to hire quickly and dismiss as needed), it has been determined that a contract is necessary to provide flexibility and adapt to fee collection needs as they change through the course of the season.

CDD-Wide Process

It is assumed that by “Process” what is meant is either a standard CDD-wide system for establishing/adjusting fee structure and schedule or a CDD-wide business planning process. In terms of a system for establishing or adjusting fees – the BLM has established a standard system nationwide. Specific details on this system can be found in Chapter 1, 1.2 – Process. As for a CDD-wide business planning process, the issues, audiences, and public lands management itself are vastly different between the areas that a business plan of this scale would lump together. Such a process might ignore niche concerns and make it difficult to communicate the intent of the business plan itself.

CDD-Wide Permit (for multiple areas, including the ISDRA)

This idea of a CDD-wide permit process is contrary to the direction provided in regulation and policy. Specifically, that fee revenues generated should remain at the site of collection. Considering a CDD-wide permit would require fee revenues generated in one location, for use of that location, to be allocated across the district. In addition, this would require a district-wide coordination effort and potentially an additional layer of administration that would be consuming fee revenue.

El Centro Field Office-wide permit (including ISDRA)

The fee charged for the ISDRA, a Special Area Individual SRP, is a different type of fee from those charged elsewhere in the Field Office. The fee charged for the ISDRA is used for special and unique services that aren’t necessarily provided in other areas of the Field Office. As such, if the permits were Field Office-wide, the expenditure would be greatly slanted and other areas may not benefit as much from fees collected.

Single or Multiple Area Permits

A single permit for many different areas, or a permit for multiple areas, was given brief consideration. However, due to the management differences between the areas and the need to ensure fee monies remain at the site of collection i.e., fees collected at the ISDRA get spent in the same area, this idea was given no further consideration.

Charge for Areas that Provide Emergency Medical Service (EMS)

All areas of the ISDRA provide EMS services. The response time may vary based on day, time, demand, and location, but EMS services are available through the medical dispatcher (911). As such, the entire ISDRA is included in the fee proposal.

Charge for EMS Calls

The idea of charging EMS services to the individual's receiving those services was considered. The BLM however, has no authority to charge for medical services in this fashion. Nor is the BLM equipped or capable of billing for such medical services, dealing with insurance companies, and debt collection firms.

Outsource EMS/SAR

The idea of outsourcing EMS to a private contractor was considered. There are many complications with this, first and foremost is that Imperial County is the principal provider and responsible party for the provision of EMS/SAR within the county. If agreement with the county could be reached, SAR could be outsourced depending on the ability of a contractor to perform such work. Outsourcing this work wouldn't necessarily result in a lower cost to the ISDRA management as the specialized equipment and training needed to perform such work would cost a contractor as much or more than the BLM. As a future consideration, EMS/SAR could be provided through an assistance agreement whereby the third-party is subsidized by the BLM up to a fixed-dollar amount, but that could also charge independently for responses to EMS/SAR calls.

Second-Vehicle Permits

The idea of a second-vehicle permit was considered. In its raw form, the idea of creating an administrative process where a primary vehicle and a secondary vehicle are tied together by family, location, or to each other, could be costly, create long lines, reduce compliance, increase law enforcement staffing / workloads, and decrease customer satisfaction. That said, however, the proposed-fee structure and schedule include the ability to buy one discounted permit for every full-price permit purchased, if purchased from a specific source (Chapter 4, 4.1 Visitor Fees). This discounted permit may be used for a second vehicle.

No Fees during in Summer Months

This idea was considered in the 2012 Draft Business Plan and has been carried forward to the final. Off-season visitation is so low, and the expenses associated with providing services and fee sales/compliance would only serve to increase overall operating costs with little to no return in fee revenue.

Day-Use Permit

The idea of a day-use fee was considered but eliminated in order to maintain high levels of fee compliance and keep the cost of enforcement down. Surveys indicate only 4.3% of visitors prefer to have a daily permit versus a weekly or season permit (UDG, 2013). With a weekly permit, compliance on a vehicle could be completed with one weekly visit. With a daily permit, compliance visits would need to be completed every day and the program would not be cost effective.

On-site/Off-site Cost Increase

The different pricing between on-site and off-site permits has been continued in the proposed-fee schedule (Chapter 4, 4.1 - Visitor Fees). The differences between on-site and off-site sales was introduced as an incentive for visitors to pre-purchase, thereby reducing traffic and wait times at the access points to the ISDRA. In past years this has been successful in reducing on-site sales to just 16 percent, providing increased customer service, and eliminating traffic congestion issues.

No Season Permits Sold On-site

The concept of no longer selling season permits on-site permits was considered because in 2012 only three percent of all permits sold were on-site season permits. The consideration of no longer selling season permits on-site was expanded upon to no longer selling season permits anywhere. However, due to public comments, and data collected in the 2012 UDG survey, a season permit option has been included in this proposal. (Chapter 4, 4.1.1 – Visitor Fees).

Radio Frequency Identification (RFID)

The idea of using RFID technology has been studied each of the past seven years and tested in prototype permits. At this time, there are no economically or logistically feasible alternatives for use of RFID in the ISDRA fee program.

Standard and Expanded Amenity Fees

The ISDRA does not qualify per FLREA to charge Standard Amenity fees – i.e., does not provide the required facilities. The ISDRA does, however, qualify to charge an Expanded Amenity fee based on the provision of basic EMS/SAR. An Expanded Amenity Fee could be charged in the exact same manner as the Special Area Individual SRP – thus the only difference would be a requirement under regulations to bring fee adjustments before the R/RAC. Since BLM policy requires the Special Area Individual SRP to be brought before the R/RAC for recommendations, an Expanded Amenity Fee would not offer any differences.

Change the Commission Permit Vendors Receive

The proposed-fee structure does reflect a reduction in the commission for permit vendors from that in the 2012 Draft Business Plan (BLM, 2012).

Require Vendors to Sell Permits without Commission

The BLM cannot require permit vendors, except the fee contractor, to sell permits. The commission was first established as an incentive to increase the permit distribution network. Now that this network is established, the commission has been reduced, but is still needed to ensure permit vendors are appropriately compensated for the administrative requirements of the permit transaction.

Require ISDRA Vendors to Sell Permits

Not all ISDRA are equipped to appropriately sell permits. If an ISDRA vendor wishes to sell permits, the vendor must request that ability from the BLM. Furthermore, the BLM may solicit vendors they deem qualified in order to expand the distribution network.

Cost to Administer Permit Vendors Comes Out of the Fee Contractors Revenues

If the fee contractor's revenues are impacted, the result is an increase in cost to the government for the contract. As such, these administration costs are paid either directly or indirectly, but still reduce fee revenue.

Charge More for Holiday Weekends

This idea was considered, but eliminated. The BLM addressed previously (2003 Business Plan) and recent surveys still indicate about 50-60 percent of the visitors would shift their visitation patterns if charged more for holidays (Haas, 2008). Furthermore, this may create increased costs and workloads on the non-holiday weekends.

Charge More for Developed Areas

In 1999, there were fee and free areas in the ISDRA based on this idea. After one year, the historical visitors to the free area requested that fees be added due to poor visitor experiences as a result of overcrowding. Due to the increased complexity and cost to administer a program where each area has different pricing, and taking into consideration previous experience, this idea was considered but eliminated.

Provide Discounts for Local Residents

This concept was addressed in the 2012 Draft Business Plan (BLM, 2012) and has been carried forward in the proposed fee structure through an off season no-fee period.

Provide Senior Discounts

Senior discounts were also considered, but due to the fact that seniors receive the same services as non-seniors and there would be complications in implementing such a program across multiple vendors, the idea was not examined in detail. The complications arise due to increased exchange of Personally Identifiable Information needed to ensure compliance with such a discount and may increase costs of administering such a program.

Expand Off-site Sales

BLM has expanded off-site sales to 80 percent of total sales and could continue to maintain off-site sales with the proposed fee structure.

Appendix C – ISDRA FY 2012 Recreation Fee Report

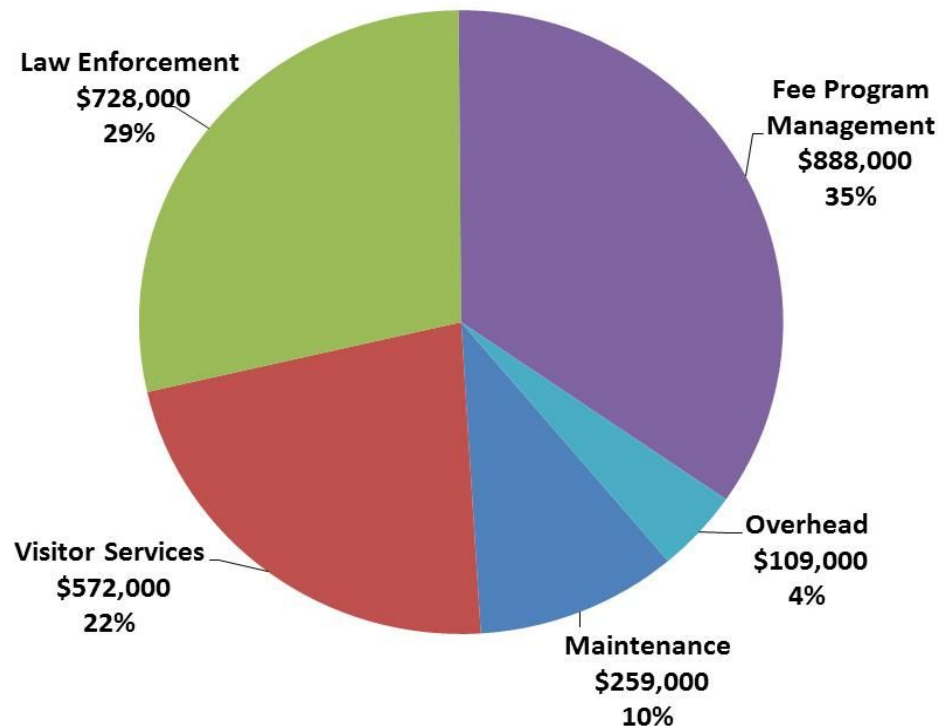
Imperial Sand Dunes Recreation Area FY 2012 Fee Program Revenue = \$2,278,000

ISDRA Revenue	\$2,278,000
Carry-over from FY11	\$106,000
Unliquidated obligations*	\$324,000
Total FY12 Funds	\$2,708,000

*Unliquidated obligations are funds that were set aside in previous fiscal years to pay for contracts that may run the course of several fiscal years. Essentially, it is carry-over funding tracked separately in the BLM system.

Total FY12 Expenditures: \$2,556,000

Carry-over to FY13: \$152,000



Expenditures included the following services for the 1,140,676 visitors to the dunes: Restrooms, Trash Collection, Road Maintenance, Outreach & Education, EMS/SAR, Law Enforcement, Recreation Program Management, and Fee Collection.

The FY 2013 priority projects for Imperial Sand Dunes Recreation Area will be based on the BLM California Strategic Framework. The Framework outlines three "Community" business line goals, "Recreation, Partnerships, and Public Safety." An ISDRA priority will be to provide recreation and public safety services within the fee budget, while reducing the cost of managing the dunes through partnerships.

ISDRA Fee Expenditure Categories:

Maintenance - Trash collection, restroom maintenance, road and camping pad grading, sand removal from road and campgrounds.

Overhead - Labor, training, and travel.

Fee Program Management - Management and labor for permit program, including on- and off-site sales, website management, printing, mailing, and vendor management.

Visitor Services - Emergency Medical/Rescue Services, dispatch, travel costs for holiday assistance, vehicles, education, outreach, and maps.

Law Enforcement - Labor, vehicles, and travel costs for holiday assistance.

Appendix D – Letter from CA State Parks, OHMVR Division



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION
Off-Highway Motor Vehicle Recreation Division
1725 23rd Street, Suite 200
Sacramento, California 95816

Major General Anthony L. Jackson, USMC (Ret.), Director

May 28, 2013

Ms. Margaret L. Goodro
BLM El Centro Field Office
1661 S. 4th Street
El Centro CA 92243

Subject: Comment letter regarding Imperial Sand Dunes Recreation Area (ISDRA) Business Plan.

Dear Ms. Goodro,

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division appreciates the opportunity to comment on the Imperial Sand Dunes Recreation Area (ISDRA) Business Plan. The OHMVR Division has a legislative mandate to ensure the citizens of California have sustainable opportunities for off-highway vehicle (OHV) recreation. The OHMVR Division has a long standing cooperative relationship with the Bureau of Land Management (BLM) in support of effectively managed OHV recreation.

The ISDRA is recognized as one of the premiere OHV recreation opportunities in North America. It is an extremely valuable recreational resource for the people of Imperial County and the State of California. The OHMVR Division, through the Grants and Cooperative Agreements (Grants) Program, has provided substantial financial assistance in support of the ISDRA. The OHMVR Division Grants Program provides annual funding to the BLM specifically for OHV recreation related law enforcement, search and rescue and emergency medical services. As funds are appropriated by the State Legislature, the OHMVR Division Grants Program will continue to provide this financial assistance on an annual basis. It is the intent of the OHMVR Division to work within the state budget appropriation process to maintain consistent future funding levels for the OHMVR Division Grants Program.

We appreciate the opportunity to provide these comments and share the BLM's desire to keep the ISDRA safe and accessible for the enjoyment of present and future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Conlin".

Christopher C. Conlin
Deputy Director, OHMVR Division

cc: Jim Kenna State Director, BLM California

Imperial Sand Dunes Recreation Area

BLM

California Desert District, El Centro Field Office

